

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

Accelerating Wireless Broadband Deployment by) WT Docket No. 17-79
Removing Barriers to Infrastructure Investment)
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Comments on behalf of the following cities in Washington State: Bellevue, Bothell, Burien, Ellensburg, Gig Harbor, Kirkland, Mountlake Terrace, Mukilteo, Normandy Park, Puyallup, Redmond and Walla Walla.

Ogden Murphy Wallace, P.L.L.C.
W. Scott Snyder
Elana R. Zana
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
Telephone: (206) 447-7000
Facsimile: (206) 447-0215
ssnyder@omwlaw.com
ezana@omwlaw.com

June 14, 2017

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**These comments are submitted on behalf of the following cities in Washington State:
Bellevue, Bothell, Burien, Ellensburg, Gig Harbor, Kirkland, Mountlake Terrace,
Mukilteo, Normandy Park, Puyallup, Redmond and Walla Walla.**

These comments were initially submitted as part of WT Docket No. 16-421 - the Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies Mobilitie, LLC Petition for Declaratory Ruling. We appreciate the Commission's consideration of these comments as part of its Notice of Proposed Rulemaking and Notice of Inquiry.

INTRODUCTION

It is critical that the Commission “get it right” when it provides direction to local governments. As Mobilitie, LLC (“Mobilitie”) aptly notes in its Petition for Declaratory Ruling, wireless facilities and the networks that connect them are “the critical infrastructure of the 21st Century.”¹ In Washington State, the growth of wireless connectivity is important to our citizens, and to our cities. However, as stewards of the public rights-of-way, it is our responsibility to be mindful of the impact of initial small cell deployment, its inevitable future expansion and the cumulative impacts of that expansion.

CONSORTIUM OF WASHINGTON CITIES

We submit these comments as a consortium of Washington State cities who, for the past year, have worked cooperatively with wireless service providers to streamline our permitting procedures to accommodate the deployment of small cell facilities in our right-of-way. We are a part of a larger consortium of 25 cities.² The consortium includes communities throughout Washington State ranging in size from Stanwood, with a population of 6,635, to Bellevue, with a

¹ Mobilitie, LLC Petition for Declaratory Ruling, *Promoting Broadband for All Americans by Prohibiting Excessive Changes for Access to Public Rights of Way*, 2 (filed Nov. 15, 2016).

² Bellevue, Redmond, Kent, Mountlake Terrace, Kirkland, Renton, Issaquah, Puyallup, Walla Walla, Spokane Valley, Gig Harbor, Mukilteo, Mount Vernon, Ellensburg, Richland, Bremerton, Oak Harbor, Bothell, Snohomish, Lake Stevens, Des Moines, Shoreline, Stanwood, Federal Way, and Burien.

population of 139,400. The consortium was formed as a result of requests made by Mobilitie to deploy its facilities (including proposals for transport facilities up to 120 feet in height in the rights of-way). In recognition of the future deployment of small cells, the cities in our consortium are working proactively to modify our codes, permitting processes and franchises, and to educate our planning and public works departments and city councils to accommodate the deployment of small cell technologies.

Of the 25 cities involved in the consortium, the majority has not been contacted by a wireless provider for the deployment of small cell infrastructure within their cities,³ and Mobilitie has only filed applications for a franchise in five of the cities. All of the applications submitted by Mobilitie were, and remain, incomplete, and all include requests for new poles or macro facilities in the right-of-way; the actual requests are a far cry from the typical small cell deployment represented in their petition.

Our consortium's efforts have been characterized by cooperation from the wireless providers to help educate our members regarding the technology of small cell deployments. We have sponsored three meetings with wireless providers to describe the providers' respective technologies, equipment and facilities, and their individual and often different deployment strategies. We have involved the wireless providers in our efforts to develop model ordinances to enable the deployment of small cell infrastructure. We developed a model franchise application, and have solicited feedback from telecommunications applicants (both wireless and wireline facilities). We are in the process of developing a model franchise/master permit that will serve as the basis for future small cell deployment. The consortium routinely works with the telecommunications industry, including nearly daily calls and emails with various telecommunications representatives and consultants.

Further, we have involved the electrical utilities in this process. Many of our member cities do not own an electrical utility. Public and private utilities own the majority of the poles within the rights-of-way and control the deployment of electrical power to wireless communications facilities. The utilities' guidance regarding the potential impacts of electrical and safety codes is an essential component of the planning process and concealment features.

Along with consortium specific meetings, we continue to meet as independent cities with the wireless providers to discuss city-specific deployments, design standards and strategies. Some wireless providers have repeatedly indicated their willingness to utilize the least, or at least less, intrusive technology and address design concerns in sensitive zones and historic districts. We would categorize our relationship with the telecommunications industry as proactive and amicable. Our plan is to continue this relationship through our development of a streamlined process for small cell deployment. We are not developing these ordinances, permitting processes, applications or model franchises in a vacuum, but rather in collaboration with telecommunications representatives and local utilities providing electricity, fiber and other infrastructure. We ask that the Commission does not derail our efforts by preempting these months of work.

³ Verizon has commenced contacting about a third of the consortium cities and recently started requesting franchises.

THE ROBBER BARON ERA IS HOPEFULLY OVER

Wireless providers often compare themselves to telephone and other wireline facilities when raising the issue of discrimination and equal access to the right-of-way. In our state, original wireline facilities were installed in the 1880s and 1890s. This was a time when the existence of telephone, telegraph and later electricity was of such benefit to communities that it outweighed any consideration of the impact of these facilities. This was also a time in our national history when environmental or aesthetic concerns were not a consideration. Rivers were dammed, and forests clear cut to further private business interests. Similarly, the telephone and electric companies placed poles in the public rights-of-way at their discretion.

Over time, we as a nation have come to appreciate the need for thoughtful regulation of our environment. With wireline facilities, cities determined that the undergrounding of the wires significantly enhances the public environment by protecting sensitive view corridors and the residential environment in general. These undergrounding activities also occur to enhance public safety and avoid an abundance of structures in the public rights-of-way that are distracting to drivers.⁴ Further, undergrounding protects our electrical and telecommunications infrastructure in case of emergencies, such as major windstorms, which are quite common in the Pacific Northwest. Many of our communities have, either at public cost or through private contributions and initiatives, undergrounded substantial areas of the community.⁵ While it is reasonable to provide access for small cell deployments to existing utility poles, the installation of new structures dedicated to small cell or macro cell use and the use of replacement structures different from or larger than the originals are subjects which require greater scrutiny. We should be permitted to require providers to assess other reasonable options such as roof-mounted equipment, panel antennas and co-location through “least intrusive means” tests before installing macro tower transmission facilities or new or larger replacement structures in the public rights-of-way, particularly in undergrounded areas, downtown districts, sensitive view corridors, historic districts and environmentally sensitive areas such as the shoreline.

As noted, our cities have made substantial investments in their downtown business core. Many downtown business districts declined in the 1980s due to competition from large malls and other specialty shopping areas. Since then, communities have invested heavily in revitalizing their downtown cores. The current regulatory framework encourages wireless providers to work with local governments to design replacement structures such as lighting fixtures to fit within the cities’ designed streetscape. If cities are limited in their ability to require public right-of-way users to adhere to design standards (by unlimited discretion to place new poles in the public right-of-way, or to increase the height of existing poles) then our investment of public and private money will be significantly undercut. Why would a business entity spend the extra money if it has the right to locate its equipment, as it pleases, in any fashion that it pleases? Our

⁴ “Traffic on nearly all streets and highways has increased considerably in recent years. With this increase in traffic has come an increase in accidents. Collisions with solid objects in proximity to the traveled portions of our streets and highways enhance the injuries resulting from these accidents. Furthermore, street obstructions created while carrying out improvements or while repairing, replacing, or relocating utility poles and wires increase the risk of accident. Requiring that all wires be placed underground at the same time that the street is improved promotes the public’s safety by reducing the number of times a street must be blocked.” *GTE v. Edmonds*, 21 Wn. App. 218, 223-224 (1978).

⁵ See Exhibit A for examples of costs associated with recent undergrounding projects.

efforts to restore the vitality of our central business districts are bearing fruit as more of our citizens return to inner cities to live, shop and work.

One of the members of our larger consortium has undergrounded virtually its entire city and has embraced the dark sky theory to reduce light pollution by using low-rise light standards. Many undergrounding efforts were undertaken at the expense of the abutting property owners through assessment processes known in our state as Local Improvement Districts. In our communities, abutting property owners retain a fee interest in the underlying public right-of-way.⁶ They literally “own” the right-of-way abutting their properties. Their concerns should be considered. The right-of-way is their front yard. Many of the regulations being sought in the petition not only harm local governments, but in Washington State, at least, have a significant effect on the ownership interests of abutting private property owners.

CITIES ARE THE STEWARDS OF THE RIGHTS-OF-WAY

As the Washington State Courts have told us, the primary purpose of the public right-of-way is transportation.⁷ In addition to the primary transportation use, a wide variety of public utilities and other business interests hold franchises, which permit the use the public right-of-way to conduct business. Railroads, water, sewer, telephone, electricity, backhaul telecommunications providers and a wide variety of other uses have occupied the public right-of-way over the years. Use of the public right-of-way has and will continue to evolve. Any action by the Commission should take into account that continual evolution.

As local governments, we have made an enormous investment in our cityscape. The high-usage areas targeted by the providers for small cell deployments are often areas in which cities have made substantial investments in the form of downtown revitalizations. Our cities have spent hundreds of millions of dollars on their streetscapes. That investment comes in the form of undergrounding utilities, ornamental lighting, street furniture, decorative surfacing and other amenities which are an important part of downtown revitalization. No business entity should be given an individual right to override local communities’ efforts to protect their aesthetic environment and undermine their significant investment. The providers often reference the investment they are about to make in the deployment of small cells in the right-of-way, but that substantial investment is dwarfed by our investment of local tax revenue, grant moneys and local private investment in the streetscape.

We believe the Commission may have been misled regarding the aesthetic impact of small cells as evidenced by the following statement: “Due to their size and placement, small cells may have

⁶ *Finch v. Matthews*, 74 Wn.2d 161, 167-68 (1968).

⁷ “Normally, the interest acquired by the public is but an easement. * * * [Citing cases.] But whatever the nature of the interest may be, it is held in trust for the public, and the primary purpose for which highways and streets are established and maintained is ‘for the convenience of public travel’ * * * [Citing cases.] In addition to this primary purpose, however, there are numerous other purposes for which the public ways may be used, such as for watermains, gas pipes, telephone and telegraph lines, etc. These are termed secondary uses and are subordinate to, and permissible only when not inconsistent with, the primary object of the highways. * * * [Citing cases].”

Winkenwerder v. Yakima, 52 Wn.2d 617, 625-26 (1958) (quoting *State ex rel. York v. Board of County Commissioners*, 28 Wn.2d 891 (1947)) (asterisks and brackets in original).

less potential for aesthetic and other impacts than macrocells.”⁸ Though many wireless providers have made strides to work with cities to design small cell deployments, these deployments necessarily contain multiple boxes and antennas, require wireline attachments for electricity and backhaul, include exterior conduit.⁹ Deployments are often placed on wooden utility poles that were originally designed to fade into the background of local vegetation. Note that the exterior conduit and cabinets, rather than the small cell antennas themselves, create the bulk of the installation and magnify the eyesore.¹⁰ Further, due to the sheer number of small cell deployments, in addition to the number of providers and other telecommunications infrastructure companies, small cell deployment – if not properly regulated – will become even more visible. Unlike macro facilities which are often placed in industrial or commercial areas, on private land, attached to buildings, or are otherwise camouflaged, the wireless small cell providers want to deploy small cell facilities in the public thoroughfare. Moreover, macro facilities are discouraged through zoning regulations from placement within residential, downtown districts and other sensitive zoning districts.

The wireless providers, whom we are attempting to accommodate, want specific exemptions from these zoning requirements for their small cell deployments, specifically so that they can deploy these facilities *in* residential and downtown districts. Such requests can be especially burdensome in planned neighborhoods where utilities are often underground and existing street light poles do not exceed thirty feet. Siting small cell facilities becomes even more difficult in residential areas where backhaul was not installed at the time of the initial undergrounding of the power, telephone and cable lines. Deploying small cell facilities in these areas requires street cuts and traffic disturbances. We recognize the need to provide capacity to wireless customers. We are willing to work cooperatively telecommunications providers to plan how to best deploy their facilities. We believe these concerns can be resolved, but only through a collaborative process.

The public right-of-way is an asset to be utilized but it is also our front yard, our market place and, most importantly, the public thoroughfare.

THE MORPHING OF SMALL CELLS

Under current regulations utility poles, once used for small cell facilities, become base stations, subject to expansion under the 6409(a) regulations. One of the primary concerns of our communities is how that use will evolve over time. As stewards of the public right-of-way, we are concerned that a small cell, defined in our state as an antenna of no more than three cubic feet and associated equipment cabinets not to exceed 17 cubic feet¹¹ can be expanded within the public right-of-way in volume, height and width. A cabinet box on a utility pole that started out the size of a dorm room refrigerator could become the visual equivalent of a commercial refrigerator/freezer. In order to adequately employ concealment technology we require a

⁸ *Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies, Mobilitie, LLC Petition for Declaratory Ruling*, Public Notice, WT Docket No. 16-421, DA 16-1427, 12 (WTB Dec. 22, 2016).

⁹ The exterior conduit is and spacing of such conduit is governed by the National Electric Code and the National Electric Safety Code.

¹⁰ See Exhibit B showing pictures of small cell facilities deployed in Seattle, Washington.

¹¹ RCW 80.36.375.

reasonable amount of time to consider the potential future expansion and its cumulative aesthetic impacts. As the Commission proceeds, it should be cognizant of the combined impact of placing small cells in the rights-of-way with 6409(a) regulations.

Once in place, these small cell facilities will not go away but will, under the regulations implementing 6409(a), continue to morph into larger and cumulatively more impactful facilities. Though the industry touts that these facilities are small and are getting smaller, the current regulatory environment permits the expansion of these facilities with little to no oversight permitted by the municipal government. We ask that the Commission issues a new rule stating that the 6409(a) regulations related to wireless facilities modifications¹² are not applicable to small cell deployments. In the alternative, we ask that the Commission explicitly acknowledge that a small cell facility by very definition is a concealment element under 6409(a) regulations.

MOBILITIE'S BUSINESS MODEL

After close to a year of conversations with Mobilitie, we have come to realize that Mobilitie is masquerading its infrastructure build out as a small cell deployment. Its business model differs from other wireless providers in that it seeks to locate transmission (macro cell) facilities in the public right-of-way. Mobilitie's plans require a deployment of macro cell facilities of up to 120 feet and small cell infrastructure sited on new poles. Wireless providers and other telecommunications companies such as Crown Castle and American Tower have primarily constructed macro cell towers and monopoles on private or public property outside of the rights-of-way. The telecommunications providers now seek to use small cell deployments to fill in holes in their network. Mobilitie, on the other hand, proposes to construct not only small cell facilities in the public right-of-way but also macro facilities. Macro facilities are proposed by Mobilitie to be up to 120 feet tall with a four foot six inch base. This diameter is slightly smaller than a round table seating eight people. Placing these facilities on sidewalks and in other parts of the public rights-of-way will likely violate ADA requirements. Further, even the small cell facilities that are proposed by Mobilitie are often on new poles in the public rights-of-way rather than on existing infrastructure.¹³ Mobilitie's transportation or monopole facilities are out of scale with the small cell facilities suggested by other providers and are typically (and properly) regulated through the land use process in our cities. This zoning review treats all providers' transportation facility towers and monopoles equally. A review of Mobilitie's "small cell" deployment requests cannot ignore that they include these macro facility requests.

Working with Mobilitie has proven to be challenging. Significant turnovers in principle staff members have hampered our discussions, as have differing descriptions of deployment. In addition, Mobilitie initially created confusion by approaching our member cities under a different name: Network Transmission Authority, WA LLC. Each of our member cities has been contacted by Mobilitie. However, Mobilitie has filed applications for franchises/ master permits in only five of our member cities. Despite notices of incompleteness provided months ago, to date no complete application has been filed by Mobilitie in any member city.

¹² Specifically a revision to 47 C.F.R. § 1.40001.

¹³ See Exhibit C.

We have included as Exhibit C, three examples of Mobilitie construction and photo simulation drawings that were submitted to cities in the consortium. Rather than adhering to the Commission, state and local guidance to utilize co-location in facility deployments, Mobilitie's plans outright ignore opportunities to co-locate. As an example, in Kirkland, Washington, Mobilitie proposed a fifty foot pole in a residential area on the side of the street that is purposefully without utility structures, rather than co-locating on existing utility poles on the other side of the street. The new pole is proposed to be placed outside of an apartment building, a preferred existing structure for the location or co-location of telecommunications equipment in Kirkland. Most troublesome, Mobilitie's proposed new pole is a mere one block away from an existing telecommunications tower with multiple wireless facilities as well as a nearby school and church location with existing installations.¹⁴ We believe that many of Mobilitie's concerns regarding the length of time needed to acquire approvals can be addressed through its own lack of preparation and its failure to present a complete application packet upon original submittal. Cities have a right to proper organization, pre-planning, adherence to city-code, and appreciation of city staff time by Mobilitie.

The cumulative impact of small cell deployments in high-usage areas and the impact of Mobilitie's attempts to locate new poles and 120-foot transmission poles in the public right-of-way require careful consideration. Mobilitie has failed to articulate (other than cost reasons attributable to its own unique business model) why these new poles must be in the rights-of-way, rather than attaching their facilities to existing infrastructure such as buildings, utility poles, existing macro facilities, and other public infrastructure such as water towers. Mobilitie's business model ignores the emphasis put on co-location by cities, states and the Commission.

Despite our past difficulties with Mobilitie, we do acknowledge that the current Mobilitie team is better prepared and have met with our consortium members twice; however, no complete applications for a franchise have been filed.

THE LAW OF UNINTENDED CONSEQUENCES

Mobilitie's arguments that fees for the use of public right-of-way should be limited to the costs of administration would logically create an environment which encourages the migration of macro tower facilities to the public right-of-way. Why would a business entity spend tens of thousands of dollars per year to lease a site for a macro tower when it can install such a facility in the public right-of-way for the cost of processing a permit (as Mobilitie suggests)? This logic will encourage the movement of macro facilities from private property, attached to other infrastructure or water towers, and other areas designated for such macro facilities to the public rights-of-way, eliminating the financial incentives towards co-location. We suggest that Mobilitie has not proposed plans for co-location on existing facilities because it does not fit with its business model. Rather than place its small cell facilities on existing facilities that currently host other telecommunications structures or construct its transportation facilities in areas zoned for that use, Mobilitie insists that its new poles (both those housing small cell and larger 120-foot facilities) *must be* in the rights-of-way. In essence, Mobilitie contends it has a personal right to the public right-of-way that surpasses that of any other person and/or business. There is no

¹⁴ For example, outside the church property (approximately a quarter mile away) is a utility pole with existing wireless communications facilities.

support for Mobilitie's claim that its use and proposed facilities trumps any other use of the public rights-of-way.

Furthermore, if Mobilitie's business plan works, what will stop other providers from locating their macro tower facilities in the right-of-way? Once this door is opened, principals of competitive equity will make it difficult to close. Considering the fair market value of the public right-of-way for Mobilitie's macro cells in light of other providers' leases and investments is an appropriate use of that discretion and therefore treats all telecommunications companies evenhandedly.

FAIR AND REASONABLE COMPENSATION SET BY STATE LAW

The Commission's proposed action in interpreting Section 253(c) is antithetical to the language of the statute and Congressional intent. The language of Section 253(c) itself is clearly aimed at preserving state and local regulatory authority. As noted by several of the Circuit Courts,¹⁵ only Sections 253(a) and (b) may be preempted by the Commission under Section 253(d). The legislative history of Section 253 further clarifies that Congress explicitly limited Commission preemption power to Sections 253(a) and (b), thereby giving the authority to enforce Section 253(c) to the federal courts, not the Commission. In so doing, Congress recognized not only the historic authority of state and local governments to manage their right-of-ways, but also that "fair and reasonable" compensation will vary by locality, and depend on a unique set of facts and circumstances. Congress determined state and local governments are best situated to make such determinations, with the oversight of the federal district courts.

During debate on Section 253, Senator Gorton offered an amendment containing the current language of the section, explaining:

There is no preemption ... for subsection (c) which is entitled, "Local Government Authority," and which is the subsection which preserves to local governments control over their public rights of way. It accepts the proposition ... that these local powers should be retained locally, that any challenge to them take place in the Federal district court in that locality and that the Federal Communications Commission not be able to preempt such actions.¹⁶

Later in the debate, Senator Gordon stated further, "[The amendment] retains not only the right of the local communities to deal with their rights of way, but their right to meet any challenge on home ground in their local district courts."¹⁷

Congress purposely did not empower the Commission with regard to Section 253(c). The Commission lacks authority to offer anything more than a non-binding interpretation of Section 253(c).¹⁸ We request that the Commission defer, as Congress intended, to the state and local

¹⁵ *Qwest Corp. v. City of Santa Fe, New Mexico*, 380 F.3d 1258, 1266 (10th Cir. 2004); *Bell South Telecomm. Inc. v. Town of Palm Beach*, 252 F.3d 1169, 1187-89 (11th Cir. 2001); *TCG Detroit v. City of Dearborn*, 206 F.3d 618, 623 (6th Cir. 2000).

¹⁶ 141 Cong. Rec. S8213 (1995).

¹⁷ 141 Cong. Rec. S8308 (1995).

¹⁸ See, e.g., *Telebeam Telecommunications Corporation v. City of New York*, 194 F. Supp. 3d 178 (E.D.N.Y. 2016) (declining to adopt Commission's interpretation of types of restrictions permitted under Section 253(c)).

governments to set fair and reasonable compensation for telecommunications facilities in the public rights-of-way.

If the Commission determines that it is appropriate to provide non-binding guidance, we request that it carefully examine Mobilitie's request and defer to the reasonable exercise of state and local governments' judgment. Section 253 requires "fair and reasonable compensation from telecommunications providers, on a competitively neutral and nondiscriminatory basis, for use of public rights-of-way on a nondiscriminatory basis, if the compensation required is publicly disclosed by such government."¹⁹ Mobilitie's petition equates the term "fair and reasonable compensation" in Section 253 with the "just and reasonable" provision in the Pole Attachment Act, in Section 224. In fact, the Sixth Circuit has clearly determined that they are not synonymous:

The question then is whether the fee assessed by the City is "fair and reasonable compensation," within the meaning of the Act. In concluding that it is, the district court first examined, and rejected, TCG's contention that this phrase, which is not defined in the Act, should be given the same meaning as the words "just and reasonable" in the Pole Attachment Act, 47 U.S.C. § 224 (which applies to cable television providers' use of utilities' poles). The latter defines "just and reasonable" in terms of recovery of additional costs borne by the utility in providing pole attachments. The court noted that Congress did not choose to insert a comparable definition in the Act, that "costs" and "compensation" are not the same, and that only the totality of the circumstances could illuminate whether a fee is "fair and reasonable."²⁰

Look closely at Congressional intent. Congress determined it was necessary to define what constitutes a "just and reasonable" rate in the Pole Attachment Act itself, and gave clear direction to the Commission when issuing regulations. Congress did not give this same direction to the Commission in Section 253, nor did it provide a definition of "fair and reasonable compensation." Instead it deferred to state and local government authority. We discourage the Commission from defining "fair and reasonable compensation" under Section 253(c) as only actual costs. Had Congress intended to apply this definition it would have explicitly stated so.

We urge the Commission to defer, as Congress intended, to the state and local governments to set fair and reasonable compensation for telecommunications facilities in the rights-of-way. In fact, Washington State adopted revisions to our state laws at RCW 35.21.860 in 2000, creating a statutory framework for fees that can be charged for the usage of the rights-of-way.^{21,22} The

¹⁹ 47 U.S.C. § 253(c).

²⁰ *TCG Detroit v. City of Dearborn*, 206 F.3d 618, 624-25 (2000).

²¹ RCW 35.21.860 was revised in 2008 without modification to the compensation elements, and in 2014 as part of a bill related to small cell deployment, and therefore modifying the compensation element to require that the replacement structure has to be higher than the existing structure and the overall height of the replacement structure and wireless facility is more than sixty feet before a city may charge a site-specific charge.

²² The statute is a limitation on what cities can charge for the usage of the rights-of-way and specifically prohibits franchise fees. However, taxes and administrative fees may be recovered. We further recognize that in other states a rental fee for the rights of way is permitted, and we support the rights of those jurisdictions to charge such fees as Mobilitie and other telecommunications entities are leasing the rights of way for their private use.

statute allows a site-specific charge for personal wireless service facilities for (i) the placement of new structures in the rights-of-way, regardless of height; (ii) the placement of replacement structures if higher than the replaced structure and over sixty feet; or (iii) the placement of personal wireless facilities on structures owned by a city.²³ To ensure that these costs are reasonable and to provide a prompt and inexpensive remedy, the statute sets up a low cost binding arbitration process in which the arbitrator may evaluate the fee based “on comparable siting agreements involving public lands and rights-of-way.”²⁴

Importantly, along with creating a mechanism to aid in determining what is “fair and reasonable compensation” for the usage of the rights-of-way, the Washington State Legislature incentivized providers to use existing infrastructure before placing new facilities in the public rights-of-way. Site specific charges related to personal wireless facilities on non-city owned structures and pre-existing structures are not permitted by the statute. The Commission has a long history of encouraging co-location on existing infrastructure as well. A declaratory ruling defining “fair and reasonable compensation” in line with Mobilitie’s request would eviscerate one of the key tools to encourage co-location. We request that the Commission decline to adopt an interpretation of “fair and reasonable” compensation.

FINANCIAL IMPLICATIONS

In its filing, Mobilitie alleges that certain states, Washington among them, charge a six percent fee for Mobilitie to occupy the right-of-way. *This is a significant misstatement of the purpose and application of Washington’s Business and Occupations Tax.* Washington State has no income tax. Local governments rely on property taxes, sales tax and a limited number of Business and Occupations (“B&O”) taxes. State statute specifically authorizes Washington cities to impose an excise tax on entities doing business within their jurisdiction.²⁵ Our members routinely charge utilities, including their own water, sewer and electrical utilities, a B&O tax -- typically six percent as a tax on the operation of the business. Wireless providers are not alone in paying this fee and, in reality, such fees are passed through to consumers by the utilities. In fact, the statute requires that ordinances imposing such utility taxes, including taxes on telephone service be subject to referendum and initiative.²⁶ Thus consumers are free to repeal such taxes or prevent them from going into effect.

Federal courts have repeatedly recognized that similar charges constitute taxes, even when imposed on users of a municipality’s rights-of-way.²⁷ Moreover, local taxes such as Washington’s B&O tax fall outside the Commission’s preemption authority.²⁸ That Congress

²³ RCW 35.21.860(e)

²⁴ RCW 35.21.860(e)

²⁵ Chapter 35A.82 RCW.

²⁶ RCW 35.21.706.

²⁷ See, e.g., *Qwest Corp. v. City of Surprise*, 434 F.3d 1176, 1184 (9th Cir. 2006); *Keleher v. New England Tel. & Tel. Co.*, 947 F.2d 547, 549 (2d Cir. 1991) abrogated on other grounds by *Jefferson County v. Acker*, 527 U.S. 423, 434, 119 S.Ct. 2069, 144 L.Ed.2d 408 (1999); *Robinson Protective Alarm Co. v. City of Philadelphia*, 581 F.2d 371, 376 (3d Cir. 1978); *City of Chattanooga v. BellSouth Telecomm., Inc.*, 1 F.Supp.2d 809, 814 (E.D. Tenn. 1998).

²⁸ “Notwithstanding paragraph (1), nothing in this Act or the amendments made by this Act shall be construed to modify, impair, or supersede, or authorize the modification, impairment, or supersession of, any State or local laws

explicitly exempted such taxes from the provisions of the Federal Telecommunications Act further demonstrates the inaccuracy of Mobilitie's position in its petition.

Washington's tax structure is an oddity, but the six percent B&O tax referenced in Mobilitie's petition is not a charge to a wireless provider for right-of-way use but a lawful tax uniformly levied on most, if not all, utilities by Washington cities. The taxes are part of our state revenue structure and by definition not a charge to use the right-of-way.

APPLICATION FEES

Under Washington law, application fees associated with franchises are strictly limited. Only actual administrative expenses associated with the issuance of the franchise, permit and/or license in conjunction with expenses related to inspection and construction may be charged to the franchisee.²⁹ We have adopted a "fee deposit structure" in which an entity applying for a franchise makes a fee deposit. The actual cost of processing an application and negotiating the franchise determines the fee which is ultimately paid. The more detailed and thorough an application, the quicker it can be processed. The more prepared an applicant, the cheaper the process.

Mobilitie has requested that municipalities publicly disclose the fees that they have charged to other providers. This request is duplicative and unnecessary. Not only is the requirement to publicly disclose such compensation already expressly contained in Section 253(c), but cities are required under the state public records act to disclose this information.³⁰ Mobilitie merely needs to ask for this information from the cities, further action by the Commission is not necessary. In addition, cities often publish a rate schedule of all permit fees, hourly rates for city staff and fee resolutions setting application fee deposits. Many Washington municipal franchises state within the franchise itself the actual administrative expenses associated with issuing the franchise, many of which can be found by a simple internet search. Cities by law cannot withhold this information.

The most significant barrier to responding to Mobilitie's request regarding calculation of charges for the placement of new poles in the rights-of-way is its novelty. Many cities have not had to answer this question before. Traditionally, telecommunications providers have placed macro facilities outside of the rights-of-way. Lease rates for those macro facilities are subject to the public records requirements. There is little information to give Mobilitie about 120-foot poles in the public rights-of-way because telecommunications providers have not traditionally placed such facilities in the public rights-of-way, but rather in less intrusive locations or co-located with other providers or existing infrastructure.

pertaining to taxation, except as provided in sections 662 and 653(c) of the Communications Act of 1934 and section 602 of this Act." 47 U.S.C. § 152 note.

²⁹ RCW 35.21.860; *see also Burns v. City of Seattle*, 161 Wn.2d 129, 164 P.3d 475 (2007).

³⁰ Chapter 42.56 RCW.

THE TICKING CLOCK

At this point we are challenged to approve or deny siting applications within timeframes set by the *2009 Declaratory Ruling*. Further, significant confusion exists over which timeline applies, as the Commission has now determined that a “reasonable period of time” is 150 days for new facilities, 90 days for co-locations, and 60 days for eligible facility requests. These are in addition to our own state’s timing requirements for franchises and master permits.³¹ We dispute that these timeframes should be adjusted for small cell deployments, especially if such siting requests are on new poles. The fact that the small cells are presumptively smaller than macro-facilities does not make a city’s obligations to maintain the safety of its rights-of-way any less. Small cells are not deployed individually but in polygons or larger scale deployments of dozens of cells and include their attendant infrastructure such as fiber and backhaul.

Not all small siting requests are created equal. Small cell facilities attached to existing infrastructure, such as utility owned poles which already have power and backhaul connections are easier to review and process than small cell facilities on new poles. In fact, the Commission itself in its *2014 Infrastructure Order* noted that new poles should trigger the longer 150-day review period.³²

As a consortium, we are working with the telecommunications providers to develop a streamlined permitting process so that small cell deployment will be more efficient. This is an on-going process that we have not yet finalized, but will include a discussion of batching of permits. It is too early in this process for us to provide experience regarding the amount of time it takes for the cities to process small cell applications both for a franchise and within the planning departments. To date the City of Bellevue is the only member of our consortium that has received a complete application for a small cell deployment. We are currently working cooperatively with providers on proposed deployments, but the providers’ plans are preliminary and therefore the providers have not submitted applications.³³ We are working proactively to develop a framework for small cell deployment, but statistically valid analysis as to the timeframes for small cell deployment is premature.

We urge the Commission to allow cities to determine how best to streamline these applications based on the unique characteristics of our streetscapes, undergrounding requirements, decorative light standards, and safety needs. In addition, placing a new shot clock requirement on staff for small cells will create an added burden on cities, one which they may not have sufficient personnel to accommodate. Creating a shorter shot clock could in certain situations have the undesired effect of moving small cell applications to the front of the line, ahead of siting macro facilities and other telecommunications infrastructure necessary to coordinate small cell deployment as well as other types of public and private development. We ask the Commission

³¹ In Washington master permits must be acted on within 120 days and 30 days for use permits. See RCW 35.99.030.

³² *Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies*, Report and Order, 29 FCC Rcd 12865, 12972-24, para. 272 (2014) (*2014 Infrastructure Order*).

³³ Please note, we greatly appreciate the cooperative and collaborative nature of the providers that we are working with and believe that within the next several months as a group we can create a streamlined process.

to maintain the shot clocks already clarified by the *2014 Infrastructure Order* and allow cities and the providers the leeway to create the appropriate streamlined process.

SPEEDY DEPLOYMENT

Mobilitie and the telecommunications providers all emphasize a desire for speedy deployment. We appreciate their aim of constructing their facilities as soon as possible in order to meet their consumer demands and prepare for 5G. However, actions such as this Petition for a Declaratory Ruling or proposed legislation in states across the country by the telecommunications industry are having the exact opposite effect. City resources to plan, negotiate agreements, review applications, and issue permits are scarce. The same planning and public works directors and city attorneys that work with the telecommunications industry to enable the deployment of wireless facilities are now called on by the cities to review, analyze, comment, negotiate, and lobby in the state legislature with regard to these proposed bills. It is a distraction and an inefficient use of time. The cities do not want to be an impediment to telecommunications infrastructure, but they do require reasonable time to effectively review and coordinate these deployments.

The Commission requests comments on whether it should attempt to reconcile the differences amongst the circuits on the interpretation of “prohibit or have the effect of prohibiting” telecommunications services. We recommend that such reconciliation will have the opposite effect on the deployment of wireless technology. The cities have operated under the Circuit Court opinions for decades and have planned their ordinances, franchises, permits, and processes based on the case law established by their respective Circuits. Similar to the proposed state legislation, a Commission ruling modifying this interpretation will require cities to rewrite code, planning documents, and retrain staff. This will slow deployment and processing of applications as cities get up to speed with new requirements and interpretations.

As communities within the jurisdiction of the Ninth Circuit, we abide by its rulings regarding the review of macro cell transport facilities. As the Commission rightly notes, the Ninth Circuit has provided a clear standard that is beneficial to the industry.

The Commission has provided time frames for us to act as local government entities. The Ninth Circuit has provided us clear direction and standards, and current federal and state statutes provide remedies. The current playing field is level and provides incentives to the wireless providers to work with our communities and to utilize co-location. Requiring local governments to act promptly when they receive a complete application is reasonable and the Commission currently provides strict shot clocks for us.

CONCLUSION

Please, let us undertake the deployment of small cells in the right-of-way in a thoughtful manner. We have worked diligently and cooperatively for months, and we would appreciate the ability to continue this process without intervention by the Commission. The public right-of-way is our citizens’ front yard, our community’s living room and our market place. In Greece, this was known as the agora, a market place of ideas as well as business.

Please, do not lock us into a 19th century regulatory approach to 21st century technology by limiting local governments to 1890s wireline regulatory standards. We have learned a lot since the era of the Robber Barons. Let us apply that knowledge. The current Ninth Circuit model creates a balance through the “least intrusive means” standard which allows us to balance industry needs with our local environment. Our communities need the technology and our citizens want the service. However, each community has its own unique challenges and environments.

Accordingly, we ask the Commission to:

1. Clarify the application of 6409(a) to small cell facilities.
2. Defer to the state and local governments to set “fair and reasonable compensation” for the usage of the rights-of-way.
3. Maintain the status quo with regard to timelines, streamlining processes, and federal interpretation of Sections 253 and 332.

The Commission and the Ninth Circuit have provided a structure which balances local and industry concerns. As stewards of the public right-of-way, we understand our obligations. By all means hold us to them, but allow us to use a thoughtful approach when authorizing small cell deployments (and macro-cell deployments) in our communities.

Exhibit A
Investments in Downtown Infrastructure
Summary

A.1 - City of Bothell: Public investments = \$150 Million.

A.2 - City of Federal Way: City Center Plaza, Town Center and Sound Transit = \$300 Million.

A.3 - City of Redmond = \$166.57 Million Dollars since 2011. A total of \$1.115 Billion is expected to be spent on capital projects through 2030.

A.4 - City of Mukilteo: Redevelopment of Rose Hill Community Center = \$351,292

A.5 - City of Bellevue: Pedestrian improvements in downtown core = \$120 Million.

Exhibit A-1
Investments in Downtown Infrastructure
City of Bothell

“The revitalization of downtown Bothell is underway. The plan, launched in 2006, capitalizes on the historic charm of the City's Main Street, bringing new retail, offices and creating five new residential neighborhoods in the downtown district.

In total, the City has sold nearly a million square feet of land for development, consistent with the vision the Bothell community established. The City itself has completed public investments of over \$150 million.

The result of these public investments will be a fully integrated and pedestrian friendly downtown that reflects the City's heritage, while leveraging 25 acres of previously city-owned properties into a destination and gathering place for area residents, employees and visitors.”

City of Bothell Downtown Revitalization Plan
<http://www.ci.bothell.wa.us/319/Downtown-Revitalization-Plan>

Exhibit A-2
Investments in Downtown Infrastructure
City of Federal Way

“In November of 2014, the Mayor and City Council voted for the acquisition of a 7.48 acre parcel adjacent to the soon to be developed Performing Arts and Conference Center in downtown. In addition, the City acquired property for a park site. Combined with the Federal Way Transit Center, there are 21 acres to create growth and revitalization of Federal Way’s downtown. This is now known as the Town Center.

The effort envisions a dense mix of uses featuring a conference hotel for the Performing Arts and Conference Center along with housing, educational/classroom space, specialty retail, civic uses and open space. A theme for the Town Center consists of encouraging strategic investment in a compact environment that contains a variety of uses and creates a unique sense of place.

The City began the process in 2007 with the acquisition of 4 acres currently known as Town Center -2. The City previously issued a Request for Proposal for the site however, due to the Great Recession; the development opportunities presented during this time were impacted by tight capital markets. However, during the interim, it was used as a park site. The interim use had a very positive impact on the community and now it has been transformed to the Town Square Park.

Additionally, after many years of community discussion, the City acquired another 5 acre site for the development of the \$32.7 million Performing Arts and Conference Center. The development of this project was approved by the Mayor and City Council in June 2014. This site is known as Town Center-1. The City broke ground on this facility in October 2015 ground breaking with expectations of opening in summer of 2017.

Meanwhile, in November 2014, the mayor and City Council approved the acquisition of another 7.48 acres of property adjacent to the Town Center-1 known as Town Center-3. Based upon the interests of the Mayor and City Council, noteworthy opportunities include development of the following; a conference hotel including conference and ballroom space, along with a bar and restaurant space adjacent to the performing arts and convention facility. Additionally the City is looking for office, specialty retail, market rate housing, space for arts and entertainment including galleries, studios, museums, educational/classroom space, specifically for a culinary arts institute which will support the performing arts and conference facility. Also included is childcare facility. Additionally, Federal Way is working to recruit a four-year university for a branch campus in the city center to serve the growing higher education needs of the community and South King County.”

City of Federal Way City Center Redevelopment
<http://www.cityoffederalway.com/content/city-center-redevelopment>

Exhibit A-3
Investments in Downtown Infrastructure
City of Redmond

Redmond Comprehensive Plan Ordinance 2679, Effective 2/16/2013

Urban Centers: Downtown

“DT-22 Establish standards for Downtown streetscape treatments to reinforce the identity of Downtown zones and promote the Downtown’s aesthetic appeal. Consider use of treatments, such as special paving materials for sidewalks, street furniture, landscaping and lighting. Ensure that these treatments are implemented as part of public and private development.” (pg 14-15)

Vision Blueprint, Redmond’s Capital Investment Strategy, Approved 12/13/2011

“Capital improvements also help to facilitate economic development. For example, the City’s investments in the Downtown and Overlake are tangible steps to realize the vision for these locations, and encourage continued private investment in the City long-term. The private sector also contributes to Redmond’s physical development from minor redevelopment to major revitalization projects. This can occur in the form of new mixed use buildings with open public plazas, such as the recently-completed Red 160 development in Downtown. In addition, private developers install utilities and improve streets and sidewalks to serve new housing or commercial developments. In some cases, public-private partnerships are forged to meet mutual service goals for the public and private sector.” (pg Intro-4)

The City of Redmond has made a twenty year investment in redeveloping the downtown core, and is also focusing on improvements to other commercial neighborhoods and parks (entitled Overlake and SE Redmond). The projected costs for all of the planned projects through 2030 is \$1.115 Billion. Since 2011 they have completed \$166 Million worth of capital projects, and have fully funded \$286.25 Million in capital projects.

Exhibit A-4
City of Mukilteo - Rosehill Community Center Redevelopment

The below photographs depict the Rosehill Community Center in 2008 prior to the redevelopment and the new Rosehill Community Center in 2011 with the undergrounding of utility poles. The cost solely of undergrounding this one square block around the Rosehill Community Center was \$351,292.

Before (2008):



After (2011)



Exhibit A-5
Investments in Downtown Infrastructure
City of Bellevue

Downtown Bellevue is the City's primary growth center and fastest growing neighborhood. This 410-acre downtown area was home to 50,562 jobs in 2015 and 12,890 residents in 2016.

Projections show Downtown Bellevue growing to 70,300 jobs and 19,000 residents by the year 2030. The City has invested heavily in the Downtown public realm in the form of the 20-acre Downtown Park, Ashwood Park as well as the first phases of Meydenbauer Bay Park. The City also relocated City Hall to downtown in 2006 with significant investment in the purchase and adaptive re-use of an old telecommunications facility.

The private sector has also made significant investments in the Downtown public realm over the past three decades. Many downtown sidewalks are public easements on private property. City analysis shows approximately 18.8 miles of pedestrian improvements within Downtown in the form of public sidewalks, landscaping and associated amenities. These pedestrian improvements encompass close to 21.6 acres and are valued at close to \$120 million in construction value in 2017 dollars.

Exhibit B
Small Cell Facilities Deployed in Seattle, Washington



Exhibit C-1
Mobilitie Application for a Facility in Kirkland, WA

Narrative: Mobilitie proposed a 50 foot pole (43 feet above ground) in a residential area on the side of the street that is purposefully without utility structures, rather than co-locating on existing utility poles on the other side of the street. The new pole is proposed to be placed outside of an apartment building, a preferred existing structure for the location or co-location of telecommunications equipment in Kirkland. Most troublesome, Mobilitie's proposed new pole is a mere one block away from an existing telecommunications tower with wireless facilities as well as a nearby school and church location with existing installations.

Exhibit C-1a: Vicinity Map (created by City of Kirkland)

Exhibit C-1b: Photo Simulation (created by Mobilitie)

Exhibit C-1c: Construction designs (created by Mobilitie)

Exhibit C-1a

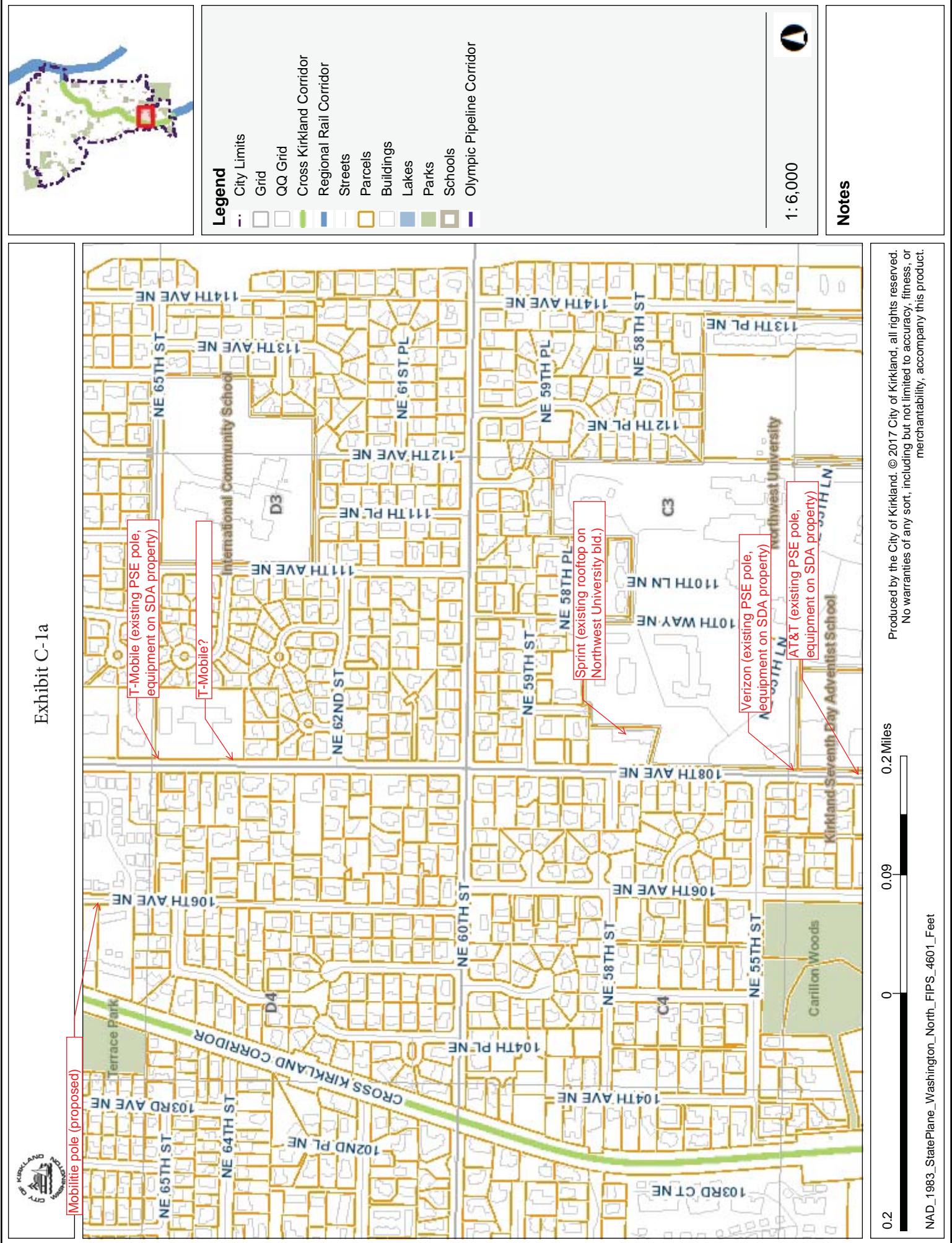
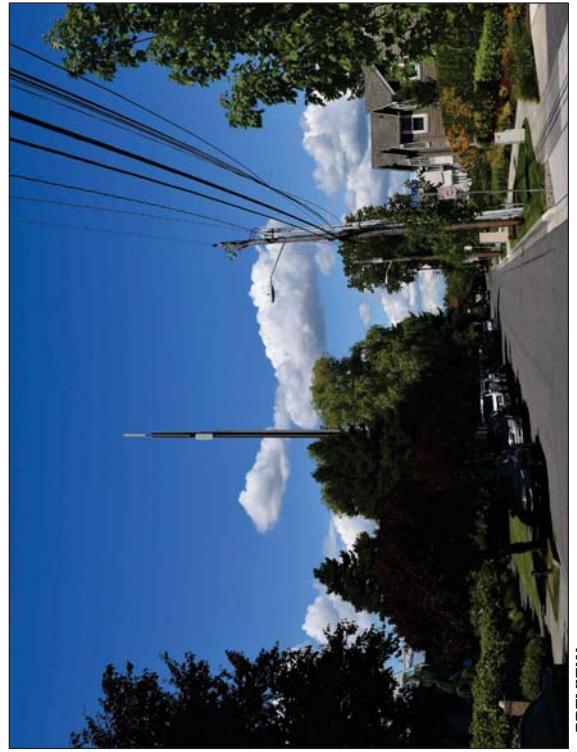


Exhibit C-1b

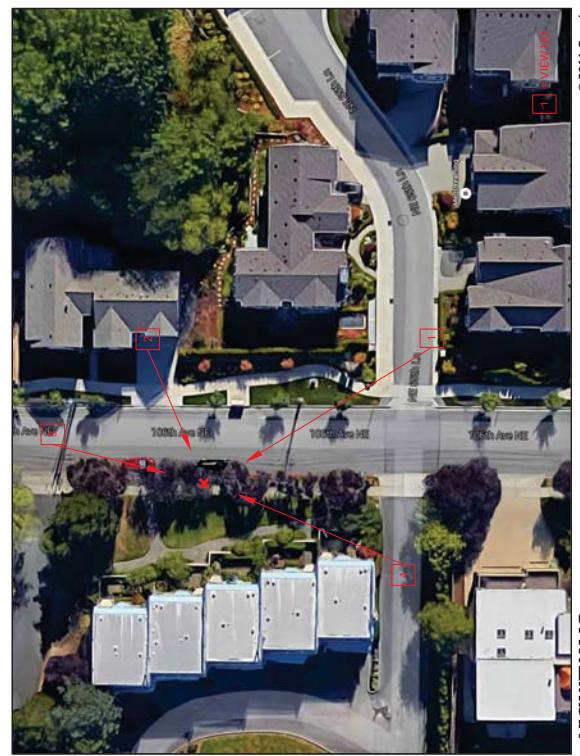
**MOBILITIE, LLC
PHOTO SIMULATION**
FOR NEW SMALL CELL SITE LOCATED AT:
**6523 106TH AVE NE & NE 65TH LN | KIRKLAND, WA 98033
9WAB001622A**



PREVIEW

SHEET: 1 / 5

Site ID: 9WAB001622A
POLE TYPE: NEW WOOD UTILITY POLE
6523 106TH AVE NE & NE 65TH LN
KIRKLAND, WA 98033



© 2016 Google

VICINITY MAP

DATE: 06/21/16

Photo Simulation
This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.

Tangent
SYSTEMS
424-262-4167 | tangentsystems.co

Photo Simulation By:

Site ID: 9WAB001622A

POLE TYPE: NEW WOOD UTILITY POLE
6523 106TH AVE NE & NE 65TH LN
KIRKLAND, WA 98033

MOBILITIE, LLC

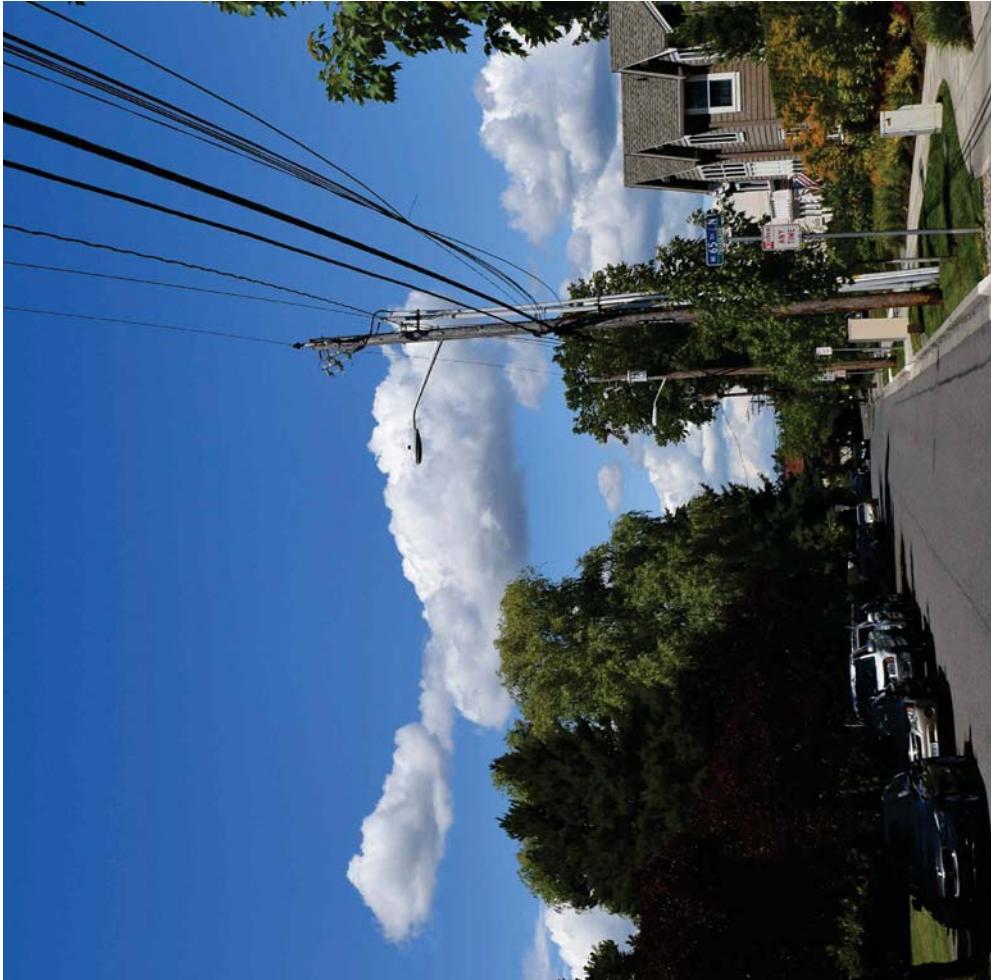
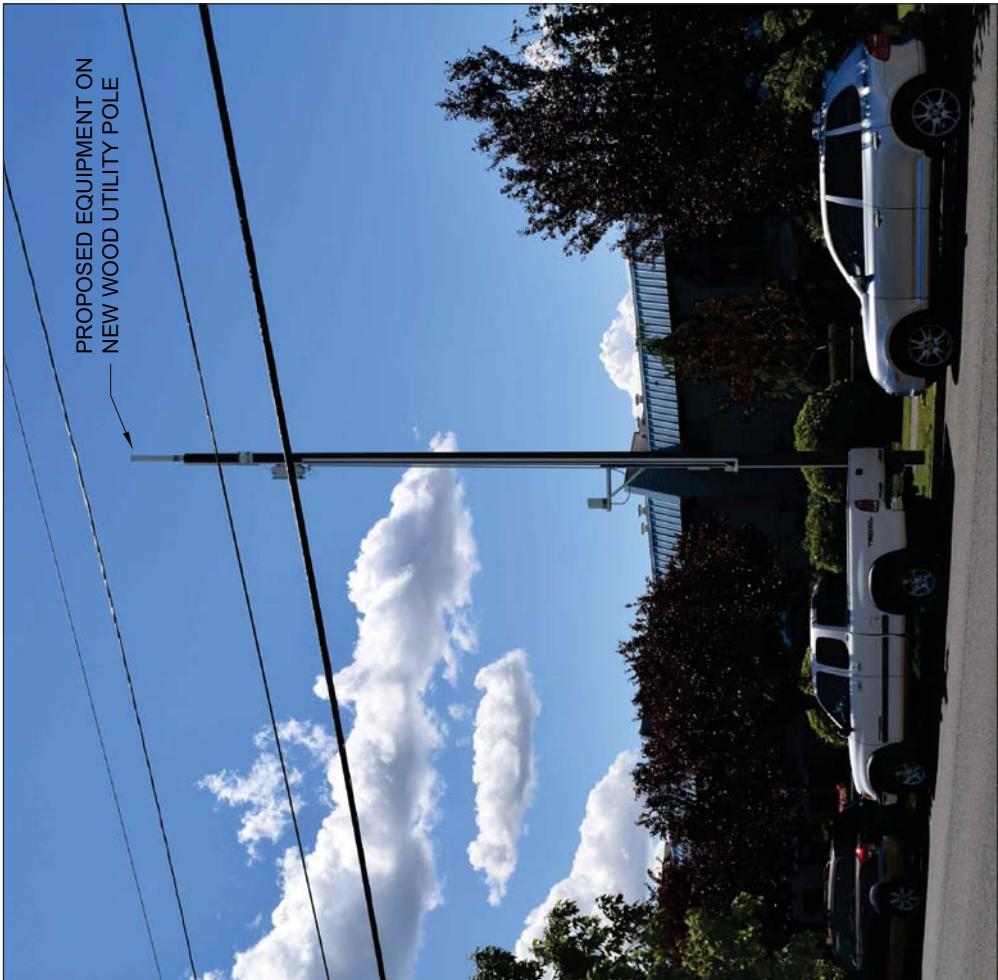


Photo Simulation By:
DATE: 06/21/16

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Photo Simulation

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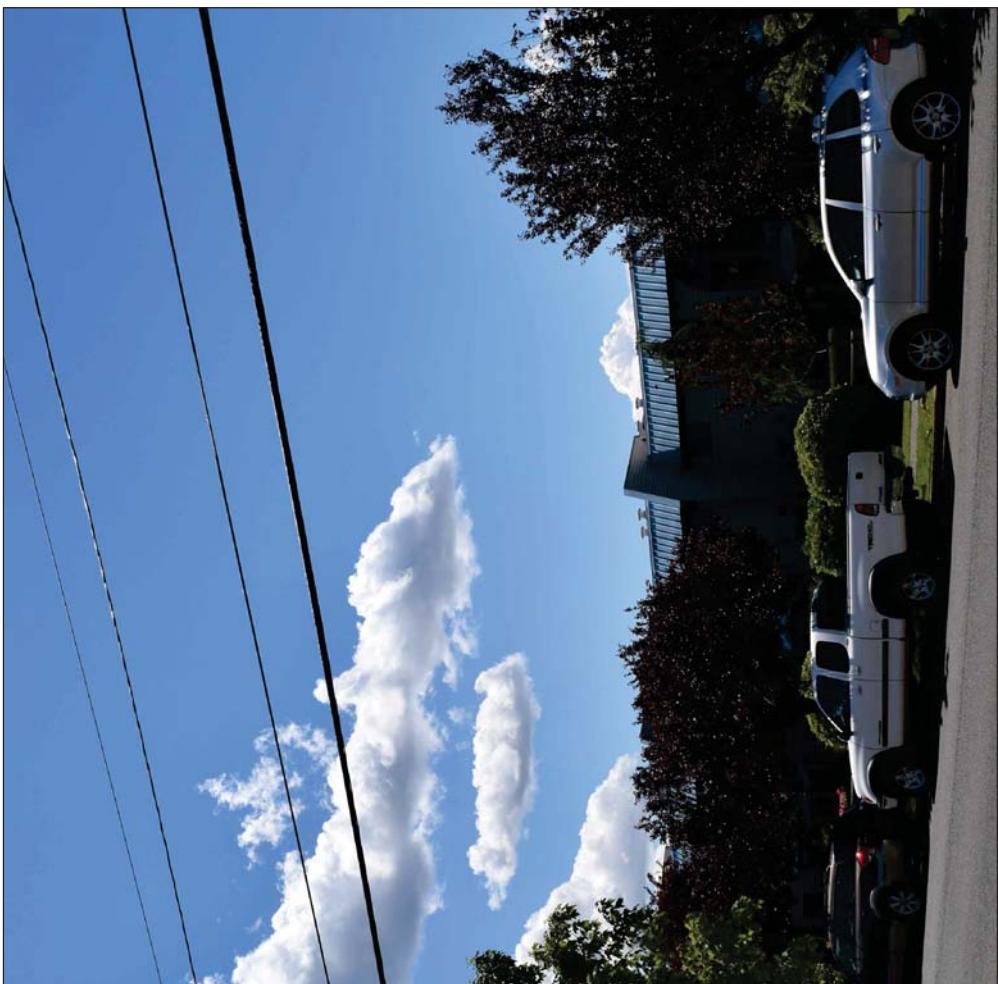


PROPOSED VIEW

SHEET: 3 / 5

Site ID: 9WAB001622A

POLE TYPE: NEW WOOD UTILITY POLE
6523 106TH AVE NE & NE 65TH LN
KIRKLAND, WA 98033



EXISTING VIEW

SHEET: 3 / 5

Photo Simulation

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MOBILITIE, LLC

Photo Simulation By:
DATE: 06/21/16

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PROPOSED VIEW

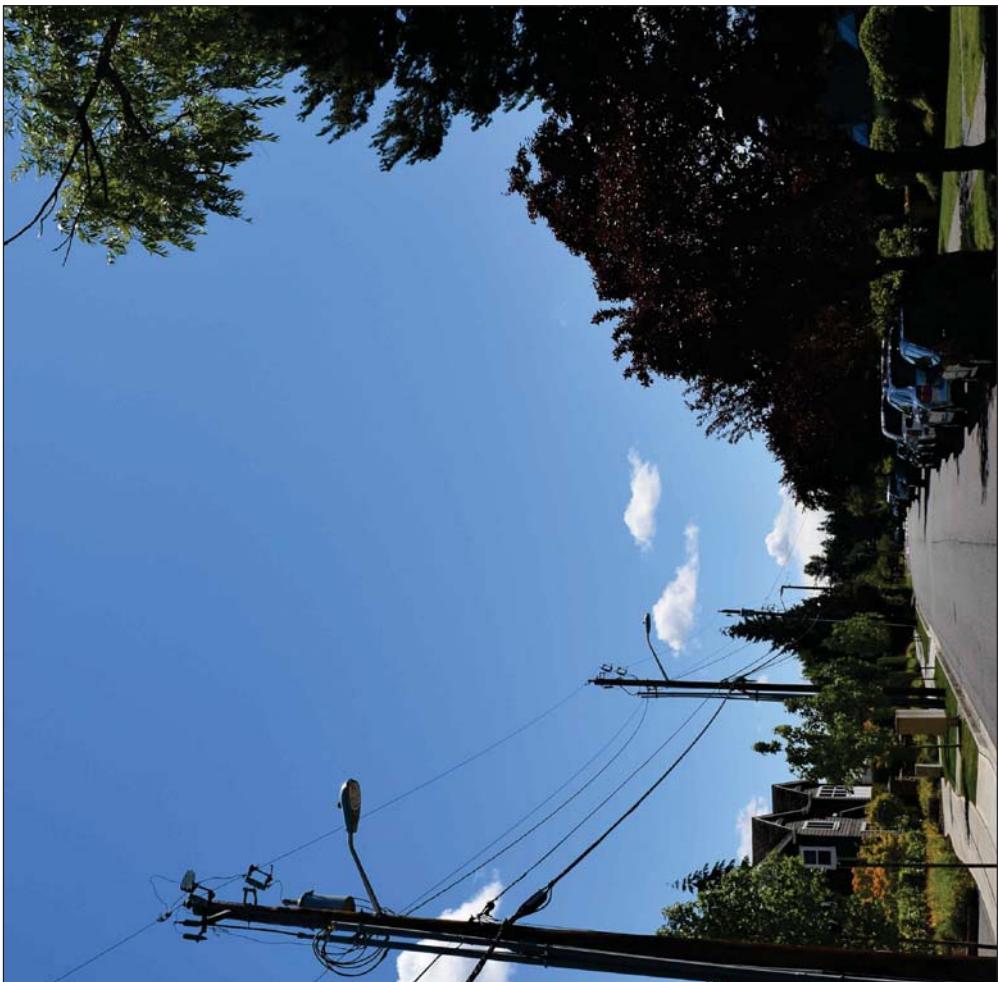
VIEW 3 - LOOKING SOUTH FROM 106TH AVE NE

DATE: 06/21/16
Photo Simulation By:

SHEET: 4 / 5

Site ID: 9WAB001622A

POLE TYPE: NEW WOOD UTILITY POLE
6523 106TH AVE NE & NE 65TH LN
KIRKLAND, WA 98033



DATE: 06/21/16
Photo Simulation By:

Photo Simulation

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Site ID: 9WAB001622A

POLE TYPE: NEW WOOD UTILITY POLE
6523 106TH AVE NE & NE 65TH LN
KIRKLAND, WA 98033

PROPOSED VIEW
VIEW 4 - LOOKING NORTH EAST FROM NE 65TH LN



Photo Simulation By:
DATE: 06/21/16

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SYSTEMS
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EXISTING VIEW
MOBILITIE, LLC

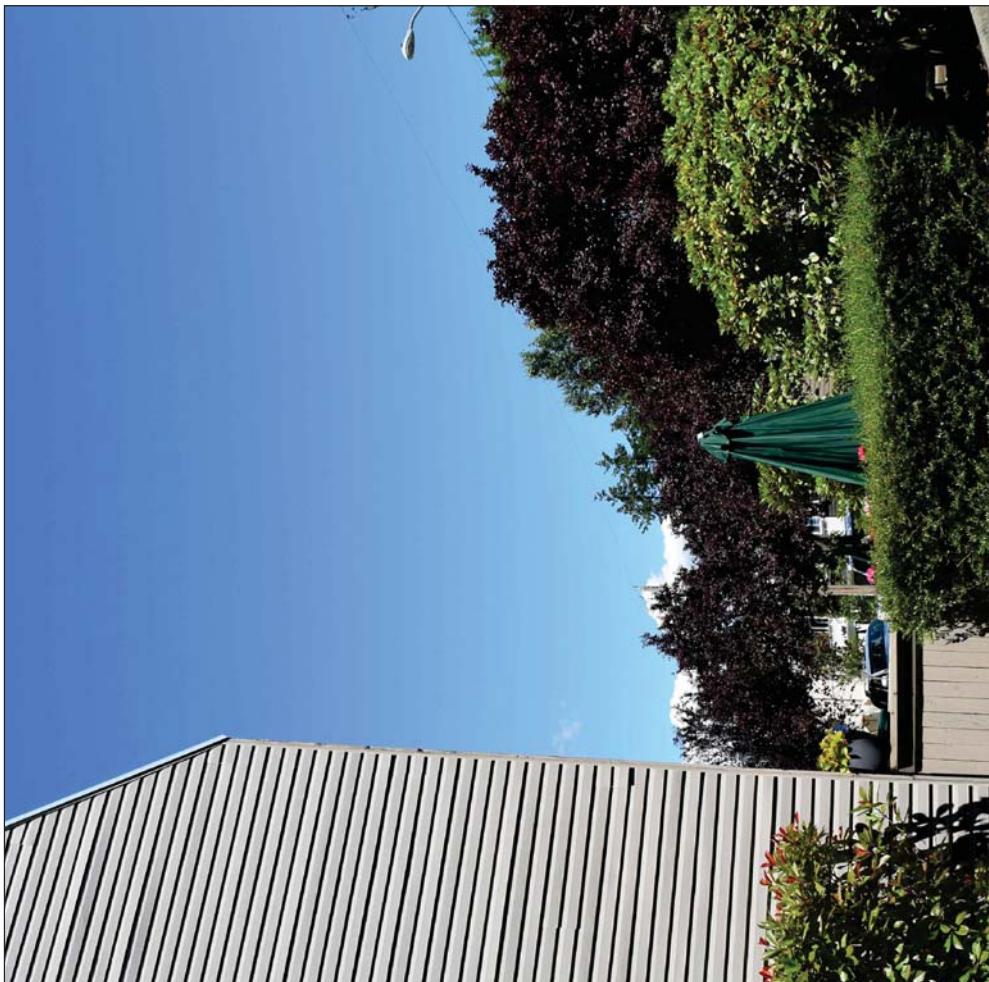


Photo Simulation

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SITE ID: 9WAB001622A

SITE LOCATION:

6523 106TH AVE NE, KIRKLAND, WA 98033
106TH AVE NE & NE 65TH LN

NEW WOOD UTILITY POLE

GENERAL NOTES	
<p>THE FACILITY IS NOT FOR HUMAN HABITATION. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OR ROUTINE MAINTENANCE. THE PROJECT WILL NOT REQUIRE USE OF ANY PAVING, WATER, OR TRASH DISPOSAL. IS REQUIRED DUE TO COMMERCIAL SOURCE.</p>	
SITE INFORMATION	
<p>APPLICANT: MOBILITIE APPLICANT ADDRESS: 265 REDHILL AVENUE, SUITE 200 CORT MESA, CA 92626 APPLICANT CONTACT: STEVEN BERKE APPLICANT PHONE: 208.461.1110 APPLICANT E MAIL: steven.berke@mobilitie.com PUBLIC/PRIVATE PROPERTY: PUBLIC ROW NEAREST ADDRESS: 1063 106TH AVE NE NEAREST APN S.: 918500.0000 SITE LATITUDE: 47° 39' 54" N (47.665311) SITE LONGITUDE: 122° 11' 54" W (-122.198011) GAS TYPE: GAS 3SF (AUG 93) GROUND ELEVATION: +15 ft AMSL COUNTY: KING JURISDICTION: CITY OF KIRKLAND</p>	<p>PUBLIC ROW NEAREST ADDRESS: 1063 106TH AVE NE NEAREST APN S.: 918500.0000 SITE LATITUDE: 47° 39' 54" N (47.665311) SITE LONGITUDE: 122° 11' 54" W (-122.198011) GAS TYPE: GAS 3SF (AUG 93) GROUND ELEVATION: +15 ft AMSL COUNTY: KING JURISDICTION: CITY OF KIRKLAND</p>
DO NOT SCALE DRAWINGS	
<p>THE CONTRACTOR SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.</p>	

LOCATION MAPS	
VICINITY MAP	SITE LOCATION

PROJECT DESCRIPTION	
<p>WORK CANOPY PURPOSE TO CONSTRUCT A NEW SMALL CELL SITE ATTACHED AN EXISTING BRANCH OF WAY. THE SCOPE WILL CONSIST OF THE FOLLOWING:</p> <ul style="list-style-type: none"> • ATTACH NEW FOWMANT TO NEW OR IT DOUGLAS FIR UTILITY POLE • INSTALL ONE E ACCESS DISTRIBUTION PANEL • INSTALL ONE E GIGABIT RADIO HEAD • INSTALL ONE E UPS ANTENNA • INSTALL ONE E UPLINK ANTENNA • INSTALL ONE E 1 METER RISER/POLE SWITCH 	
ENGINEERING	
<p>• 2010 INTERNATIONAL BUILDING CODE • LOCAL BUILDING PLANNING CODE • 2010 NATIONAL ELECTRICAL CODE • THE 2012 GS-14 TEST EDITION</p>	
DRAWING INDEX	
SHEET NO.:	SHEET TITLE
T1	TITLE SHEET
T2	GENERAL NOTES
T3	GENERAL NOTES
A1	SITE PLANS
A2	EAST & SOUTH ELEVATIONS
D1	EQUIPMENT DETAILS
D2	EQUIPMENT DETAILS
E1	ELECTRICAL PLANS
G1	GRADEPLAN PLANS
TC1	TRAFFIC/CONTROL PLANS

DIG ALERT	
Call before you dig. Washington State Dig 811-800-424-5555	

mobilitie	A&E SERVICES														
MOBILITIE, LLC	SITE ACQUISITION														
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<p>SIT. WOR. OTS</p> <p><input type="checkbox"/> DATIO <input type="checkbox"/> A TIO <input type="checkbox"/> AD BA <input type="checkbox"/> ILL OTS</p> <p>DO NOT EXCAVATE OR DISTURB BEYOND THE PROPERTY LINE OR LEASE LINES, UNLESS OTHERWISE NOTED.</p> <ol style="list-style-type: none"> DO NOT BUILD DIMENSIONS FROM DRAWINGS. DO NOT BUILD DIMENSIONS FROM DRAWINGS. SE, LOCATION AND TYPE OF ANY UNDERGROUND UTILITIES FOR APPROVALS SHALL BE ACCURATELY NOTED AND PLACED ON AS BULLETTIN DRAWINGS BY A GENERAL CONTRACTOR AND ISSUED TO A PROTECTIVE ENGINEER AT COMPLETION OF PROJECT. ALL BULLETTIN UTILITIES, FACILITIES, CONDUITS AND OTHER Dimensions SHOWN ON PLANS HAVE BEEN DETERMINED FROM AVAILABLE RECORDS. THE ENGINEER AND OWNER ASSUME NO RESPONSIBILITY WHATSOEVER AS TO THE ACCURACY OR ACCURACY OF THESE RECORDS. INFORMATION PROVIDED BY THE OWNER OR THEIR REVENUE OR ADJUSTMENT CONTRACTOR IS FOR INFORMATION ONLY AND IS NOT TO BE USED AS A BASIS FOR DESIGN. THE CONTRACTOR SHALL NOT BE HELD LIABLE FOR CONSTRUCTION OF THE PROJECT BASED ON THIS INFORMATION. CONTRACTOR SHALL VERIFY ALL EXISTING UTILITIES BOTH ON LAND AND VERTICALLY PRIOR TO START OF CONSTRUCTION. ANY DISCREPANCIES SHALL BE NOTIFIED TO THE OWNER AND THE CONTRACTOR SHALL SHARPLY ADVISE THE OWNER OF THE DISCREPANCY AND CORRECTED BY THE ARCHITECT ENGINEER. FAILURE TO SECURE SUCH INSTRUCTION MEANS CONTRACTOR WILL HAVE WORK AUTHORITY SUSPENDED AND EXPENSE, CONTRACTOR SHALL CALL LOCAL DIGGER HOT LINE FOR ITSELF OR CONTRACTOR'S NAMES AND ADDRESS. ALL NEARBY AND CONTINUOUS UTILITY TRACTOR FEE COSTS AND AREA'S TO BE INSTILLED BY CONSTRUCTION SHALL BE ADJUSTED TO BRIEFLY EXISTING GRADES. THE CONTRACTOR MAY MAKE AN EFFORT TO FEATHER INTO EXISTING GRADES AT THE END OF THE WORK AREA TO SMOOTH AND CONTINUOUS DRAINAGE, UTILITY TRENCHES, ETC. CANAL OR PROPERTY LINE BACK OR BRAZED IN ACCORDANCE WITH CORRECT OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REQUIREMENTS. STRUCTURAL FILLS SUPPORTING PAVEMENTS SHALL BE COMPACTED TO 96% OF MAXIMUM STANDARD PROCTOR DENSITY. NEW GRADES IN BUILDING AND BROWNEY IMPROVEMENT AREA TO BE ACHIEVED BY FILLING WITH APPROVED CLEAN FILL, AND COMPACTED TO 96% OF FILLER PROCTOR DENSITY. ALL FILLS SHALL BE PLACED IN UNIFORM THICKNESS, NOT EXCUSED THAT WHICH CAN BE PROPERLY PLACED. ANY FILLS PLACED ON EXISTING GROUNDS THAT ARE STEEPER THAN 10 HORIZONTAL TO 1 VERTICAL SHALL BE PROPERLY BENCHED AND THE EARTH SURFACE DRAINED BY A DEXTER ENGINEER. CONTRACTOR SHALL CLEAN ENTIRE SITE OF EXISTING CONSTRUCTION RUBBISH, NO PAPERS, TRASH, WRECK, BRUSH OR ANY OTHER MATERIALS COLLECTED DURING CLEANING SHALL BE DISPOSED OF, OR LEFT AT THE GENERAL CONTRACTOR. ALL TREES AND SHRUBS WHICH ARE NOT IN DIRECT CONFLICT WITH THE IMPROVEMENTS SHALL BE PROTECTED BY THE GENERAL CONTRACTOR. ALL SITE WORK SHALL BE CAREFULLY COORDINATED BY GENERAL CONTRACTOR WITH LOCAL UTILITY COMPANY, TELEPHONE COMPANY AND ANY OTHER UTILITY COMPANIES HAVING JURISDICTION OVER THIS LOCATION. 	<p>IRO. M. OTS</p> <p><input type="checkbox"/> ALL WORK PERFORMED SHALL BE DONE IN ACCORDANCE WITH ISSUED PERMITS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PAYMENT OF FINES AND PENALTIES FOR ANY AREAS IN VIOLATION.</p> <ol style="list-style-type: none"> CONTRACTOR AND/or DEVELOPER SHALL BE RESPONSIBLE FOR CONSTRUCTION AND MAINTENANCE OF EROSION AND SEDIMENT CONTROL MEASURES AS REQUIRED BY LOCAL COUNTY AND WATERWAYS AND SHALL BE MAINTAINED IN PLACE THROUGH FINAL INSPECTION DATE OF SITE. CONTRACTOR SHALL RETAIN CONSTRICTIVE ALL NECESSARY SEDIMENT CONTROL FENCING AND PROTECTIVE MEASURES WITHIN THE LISTS. NO SEDIMENT SHOALS ALLOWED TO EXIST THE PROPERTY. THE CONTRACTOR IS RESPONSIBLE FOR TRAINING APPROPRIATE MEASURES FOR CONTROLLING EROSION. ADDITIONAL SEDIMENT CONTROL FENCING MAY BE REQUIRED IN ANY AREA SUBJECT TO EROSION. THE CONTRACTOR IS RESPONSIBLE FOR MAINTAINING POSITIVE DRAINAGE ON THE SITE AT ALL TIMES AND ISNT AND EROSION CONTROL MEASURES MAINTAIN ON THE DOWNSTREAM SIDE OF SITE DRAINSAGE ANY DAMAGE TO ADJACENT PROPERTY AS A RESULT OF EROSION WHILE CONDUCTING A CONTRACTORS EXPENSE. CONTRACTOR SHALL BE RESPONSIBLE FOR DAILY INSPECTIONS AND ANY REPAIRS OF ALL SEDIMENT CONTROL MEASURES INCLUDING SEDIMENT RECLAWING AS NECESSARY. CLEARING OF SEDIMENT AND EROSION REMOVAL SHALL BE ONLY AS PERMITTED AND BE HELD TO A MINIMUM ONLY TREES SEEDED AND CALMING AND/OR SOOTING OF THE SITE WILL BE ACCOMPLISHED AS SOON AS POSSIBLE AFTER COMPLETION OF THE PROJECT ACTIVELY PROVIDING LAWN SUSTAINABILITY. CONTRACTOR SHALL PROVIDE ALL EROSION AND SEDIMENT CONTROL MEASURES AS REQUIRED BY LOCAL COUNTY AND WATERWAYS AND MAINTAIN THEM THROUGHOUT THE CONSTRUCTION PERIOD. THESE MEASURES INCLUDE BUT ARE NOT LIMITED TO STRAW BALES, DRAGONS, BARRIERS, AND CHECK DAMS. REPAINT OF SITES INDICATED SHALL CONSIST OF A CLEAN, HARD, SOUND, UNIFORM IN QUALITY STONE FREE OF ANY DETRIMENTAL GLUE OF SOFT FLUABLE, THIN ELONGATED OR LAMINATED PIECES, DISINTEGRATED MATERIAL, ORGANIC MATTER OR ALCOHOL, OR OTHER ILLUSIONS OF SITE MARKERS OR BOUNDARIES. OC TO PLACE UTILITY MATERIAL AT ALL CATO BASINS ADJACENT TO CONSTRUCTION SITE TO PREVENT SOLID WASTE CONTAMINATION ON ENTERING SEWER SYSTEM. 	<p>mobilitie</p> <p>MOBILITIE, LLC</p> <p>A&E SERVICES</p>	<p>SITE ACQUISITION</p> <table border="1" style="width: 100%;"> <tr> <td>DRAWN BY:</td> <td>SASCO</td> </tr> <tr> <td>DATE:</td> <td>06/13/2016</td> </tr> <tr> <td>REV.</td> <td>DATE</td> <td>DESCRIPTION</td> <td>BY</td> </tr> <tr> <td>0</td> <td>06/13/2016</td> <td>90% CONSTRUCTION ENG</td> <td></td> </tr> </table>	DRAWN BY:	SASCO	DATE:	06/13/2016	REV.	DATE	DESCRIPTION	BY	0	06/13/2016	90% CONSTRUCTION ENG		<p>SITE ID: 9WB001622A</p> <p>6523 106TH AVE NE KIRKLAND, WA 98033 106TH AVE NE # 65TH LN NEW WOOD UTILITY POLE</p>	<p>SHEET TITLE</p> <p>GENERAL NOTES</p> <p>T</p> <p>SHEET NUMBER</p>
DRAWN BY:	SASCO																
DATE:	06/13/2016																
REV.	DATE	DESCRIPTION	BY														
0	06/13/2016	90% CONSTRUCTION ENG															

mobilite

A&E SERVICES

MOBILITIE, LLC

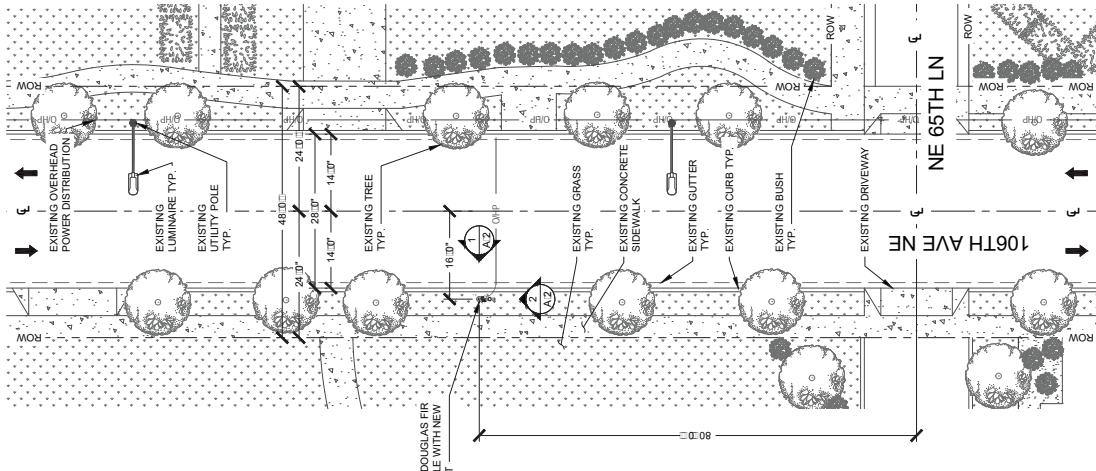
SITE ACQUISITION

DRAWN BY	SASCO
DATE:	06/13/2016

REV	DATE	DESCRIPTION	BY
0	06/13/2016	90% CONSTRUCTION	ENG

SITE PLANS

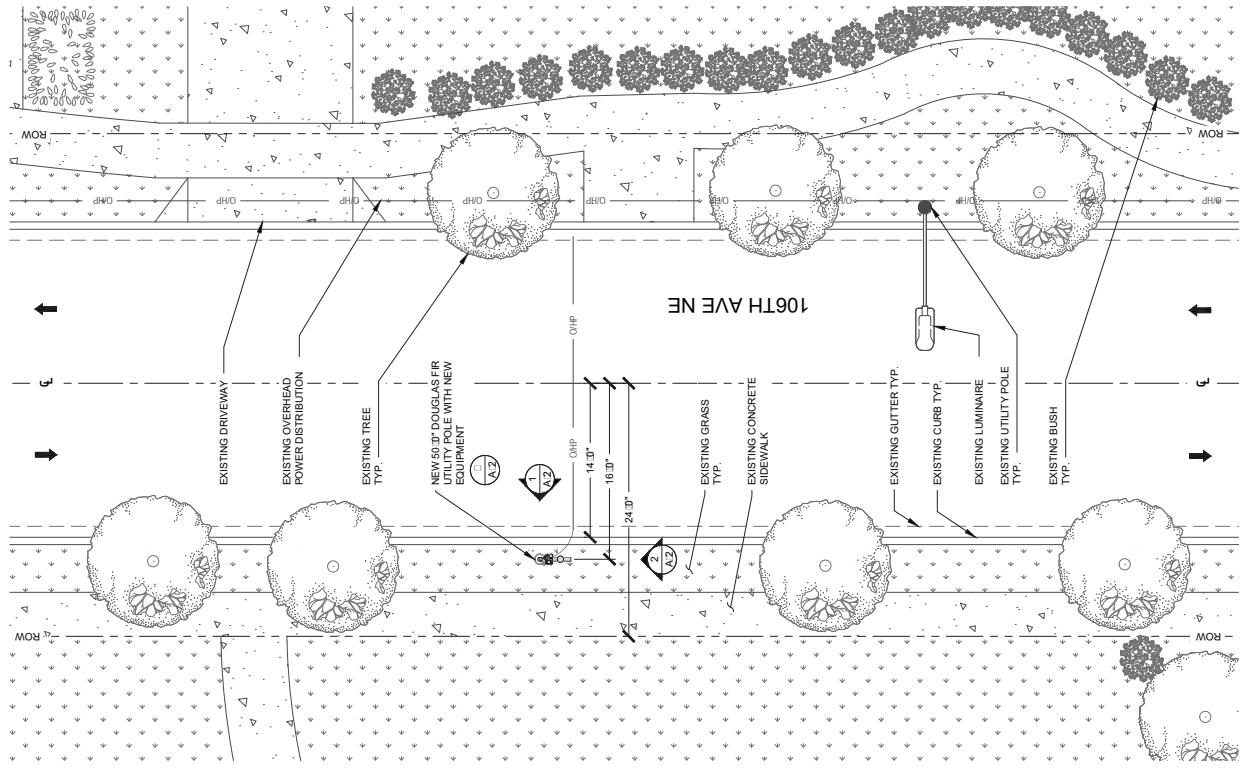
SHEET NUMBER

A-1

NOTE: EXISTING MILE POST DOES NOT EXIST WITHIN THIS VICINITY

DRAWINGS ARE DIAGRAMMATIC AND NOT FOR CONSTRUCTION AND ARE THE PROPERTY OF MOBILITIE, LLC. ALL DIMENSIONS ARE IN FEET AND ARE ESTIMATED. ALL CONDITIONS AND EXISTING CONDITIONS ARE ESTIMATED. INCLUDING PROPERTY LINES, UTILITY CONNECTIONS, ROUTING, EASEMENTS TO BE FIELD VERIFIED PRIOR TO CONSTRUCTION.

1

SIT PL**LAR D SIT PLA**

2



24'-0" SCALE: 3' 0" = 1'-0"
8'-4" = 1'-0"

MOBILITIE, LLC

SITE ACQUISITION

DRAWN BY	SASCO
DATE:	06/13/2016

SITE ID: 9WA8001622A

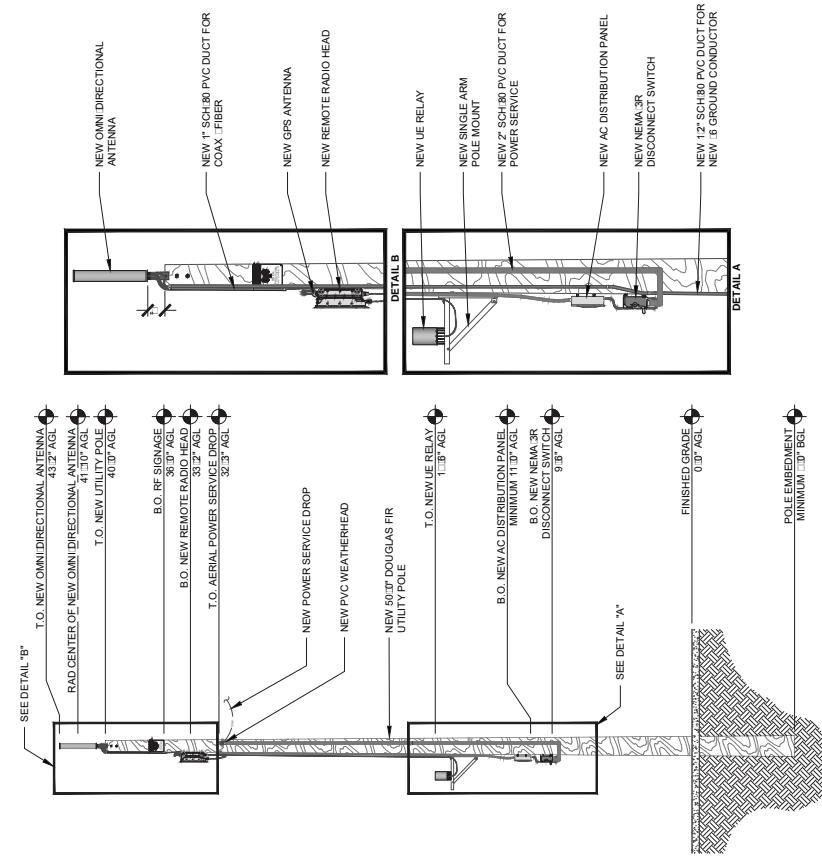
6823 106TH AVE NE
KIRKLAND, WA 98033
106TH AVE NE # 857 LN
NEW WOOD UTILITY POLE

EAST & SOUTH ELEVATIONS

ACTUAL FIELD CONDITIONS MAY VARY FROM WHAT IS SHOWN HEREIN. CONTRACTOR TO FIELD VERIFY PRIOR TO CONSTRUCTION.

A 2

1



EQUIPMENT CHART		
DESCRIPTION	CABLE LENGTH	DIMENSIONS H x W x D:
1 ALPHA WIRELESS AV3411.5 OMNI DIRECTIONAL ANTENNA	TBD	29.5' X 4.5' X 5' 0"
1 AIRSPAN R460 UE RELAY	TBD	8.8' LBS
1 PCTEL 10 D DHW GPS ANTENNA	TBD	8.8' LBS
1 AIRSPAN AH1000D REMOTE RADIO HEAD	TBD	1.1' LBS
1 RAYCAP BSTAC-311 P124AC DISTRIBUTION PANEL	TBD	18.9' X 6.6' X 5' 4"
1 SIEMENS GNE221R NEMA 3R DISCONNECT SWITCH	TBD	34.1' LBS
		8' LBS
		5' LBS
		9.9' X 6.6' X 4' 4"

□ □ W □ AST □ L □ ATIO □

2

24'-36" SCALE: 1'4" = 10'

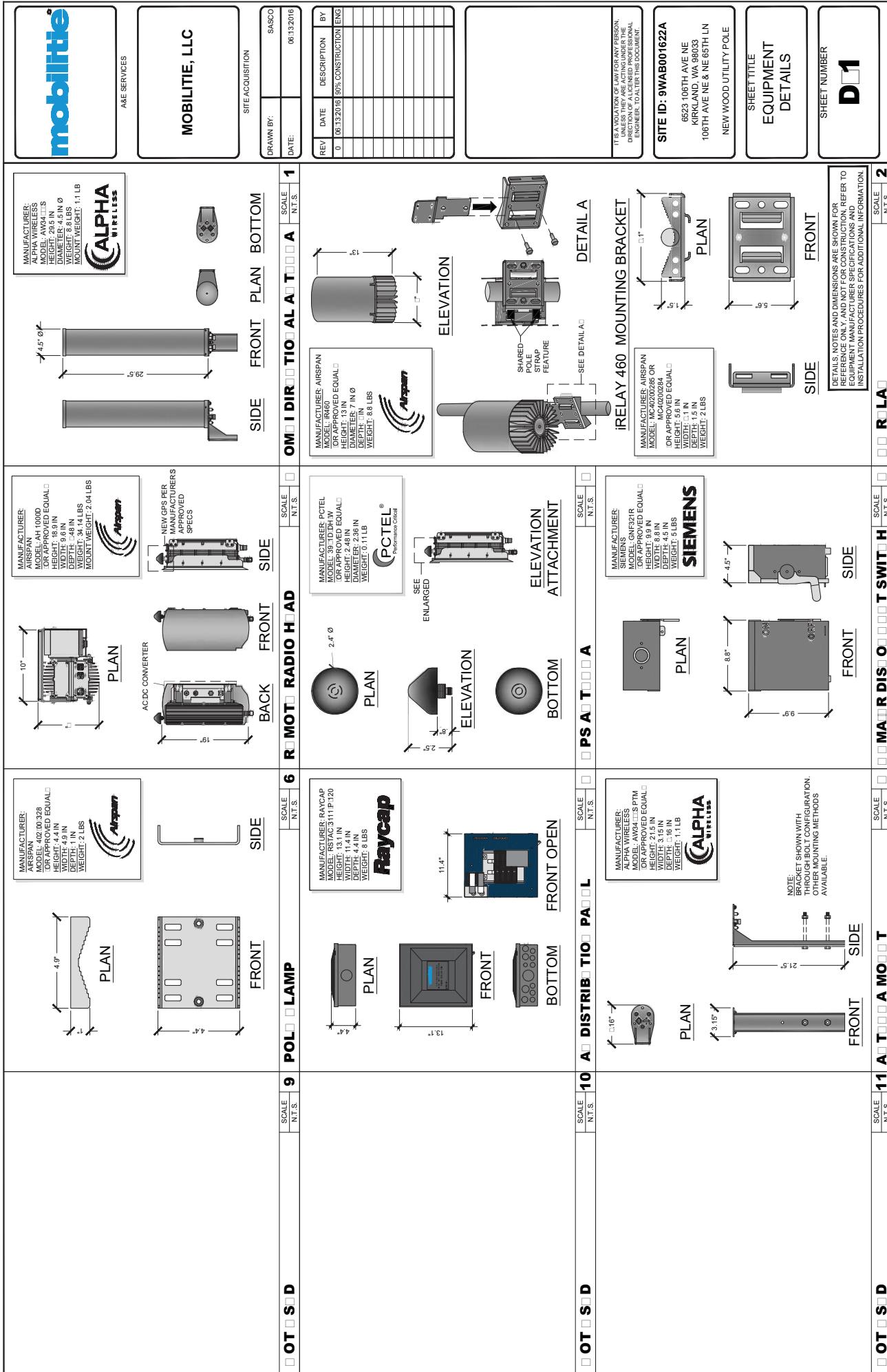
11'-1" SCALE: 1'3" = 10'

4

3

2

1



mobilite

A&E SERVICES

MOBILITE, LLC

In case of emergency contact:
EMAIL: NOC □ MOBILITE.COM
PHONE: (877) 244 - 7889

SITE ID: _____SASCO
SITE ACQUISITION
DRAWN BY _____
DATE: 06/13/2016

OWNER / OPERATOR NOTE:
SITE ID LABEL TO BE AFFIXED WITH TA5241 LABELING TAPE OR EQUIVALENT
BLACK OR WHITE LABELING TAPE OF AT LEAST 1mm WIDTH WITH
EXTRAS STRIPS OF TAPE. USE AN COMPATIBLE TOUCH LABEL MAKER.
TEXT SHOULD BE PRINTED IN ALL CAPS WITH A MINIMUM HEIGHT OF 12".

SCALE N.T.S.	<input type="checkbox"/>	<input checked="" type="checkbox"/> OT	<input type="checkbox"/> S	<input type="checkbox"/> D				
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> M	<input type="checkbox"/> R	<input type="checkbox"/> O	<input type="checkbox"/> T	<input type="checkbox"/> A	<input type="checkbox"/> S	<input type="checkbox"/> D
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> O	<input type="checkbox"/> M	<input type="checkbox"/> E	<input type="checkbox"/> O	<input type="checkbox"/> T	<input type="checkbox"/> S	<input type="checkbox"/> U
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> M	<input type="checkbox"/> L	<input type="checkbox"/> W	<input type="checkbox"/> C	<input type="checkbox"/> X	<input type="checkbox"/> Y	<input type="checkbox"/> Z
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> T	<input type="checkbox"/> P	<input type="checkbox"/> H	<input type="checkbox"/> F	<input type="checkbox"/> E	<input type="checkbox"/> G	<input type="checkbox"/> I
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/> S	<input type="checkbox"/> K	<input type="checkbox"/> J	<input type="checkbox"/> L	<input type="checkbox"/> M	<input type="checkbox"/> P
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> P	<input type="checkbox"/> D	<input type="checkbox"/> Q	<input type="checkbox"/> R	<input type="checkbox"/> S	<input type="checkbox"/> T	<input type="checkbox"/> U
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> 1						



Stay Bac
Radio frequency energy
may exceed exposure limits.
If questions, contact faculty or
o.

ANTENNA SIGNAGE:
ON WOOD POLES: SIGN ON ALUMINUM WITH SS SCREW TO THE POLE
ON CONCRETE: ADHESIVE VINYL OR BACARD STRAPPED WITH SS TIRES
ON CONCRETE OR SITE: DOCAERT STRAPPED WITH SS TIRES

SIGN PLACEMENT:
AFFIX TO THE STRUCTURE 3-4 FEET BELOW THE COMMERCIAL RF ANTENNA SITE APPROX. 8'-15'

SITE ID: 9WAB001622
6523 106TH AVE NE
CONTACT EQUIPMENT OWNER 24 HOURS
PRIOR TO SHUTDOWN AT:
1.8 □ 244 □ 389
CONTACT EQUIPMENT OWNER UPON
COMPLETION OF WORK, RELEGE
WITH PRIOR WRITTEN CONSENT OF
SPRINT ONLY.

MINIMUM APPROACH DISTANCE TO
PRIMARY ANTENNA: 4.14ft
SECONDARY ANTENNA: 1.31ft

INNER PANEL
SITE IDENTIFICATION

DE-ENERGIZING PROTOCOL LABEL

SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> A	<input type="checkbox"/> T	<input type="checkbox"/> S	<input type="checkbox"/> D
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> A	<input type="checkbox"/> S	<input type="checkbox"/> I	<input type="checkbox"/> E
SCALE N.T.S.	<input type="checkbox"/>	<input type="checkbox"/> A	<input type="checkbox"/> S	<input type="checkbox"/> I	<input type="checkbox"/> E

MANUFACTURER: ALUMAFORM, INC.
MODEL: CAM DINN 42
DIMENSIONS: UNIT WEIGHT:
A 24" 24.48LBS
B 8"
C 24" MAX

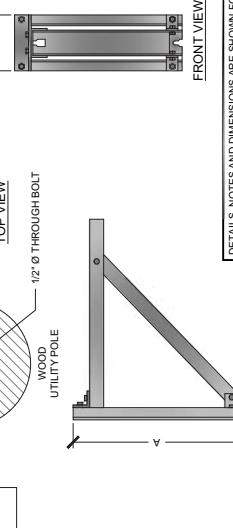
REV	DATE	DESCRIPTION	BY
0	06/13/2016	90% CONSTRUCTION ENG	

SITE ID: 9WAB001622A
6523 106TH AVE NE
KIRKLAND, WA 98033
106TH AVE NE & 85TH LN
NEW WOOD UTILITY POLE

EQUIPMENT DETAILS
SHEET NUMBER D □ 2

DETAILS, NOTES AND DIMENSIONS ARE SHOWN FOR
REFERENCE ONLY AND NOT FOR CONSTRUCTION. REFER TO
EQUIPMENT MANUFACTURER SPECIFICATIONS AND
INSTALLATION PROCEDURES FOR ADDITIONAL INFORMATION.

SCALE: N.T.S.



FRONT VIEW
SIDE VIEW
ISOMETRIC VIEW

10 **OT** **S** **D**

SCALE
N.T.S.

A **T** **S** **D**

SCALE: N.T.S.

11 **OT** **S** **D**

SCALE
N.T.S.

A **T** **S** **D**

SCALE: N.T.S.

<p>POL <input type="checkbox"/> LIMI <input type="checkbox"/> AR <input type="checkbox"/> TILIT <input type="checkbox"/> PLA <input type="checkbox"/></p> <p>FORMATIO <input type="checkbox"/></p> <p>STREET NAME: NW 106TH AVE NE STREET NUMBER: 6623 ROUTE TYPE: 106TH AVE NE LAT/LONG: 47° 46' 51.31" N 122° 19' 00.01" W</p> <p>PROPOSED ATTACHMENT HEIGHT: TBD INSTALLATION TYPE: UTILITY POLE RECORD POLE OWNER: RECOGNIZE AEROCORE EXISTING POLE POWER PROVIDER: PSE LENGTH OF PROPOSED POWER POLE: TBD REQUIRED TO BRING POWER POLE TO SITE: LAT LONG OF POWER POLE: 47° 46' 51.33" N, 122° 19' 00.00" W VISIBLE WIRE BACKHAUL OPTION: METHOD OF INSTALLMENT: BASE FILL/QUICK SET FOAM SPECIAL SITE NOTES:</p>	<p>mobilitie</p> <p>A&E SERVICES</p> <p>MOBILITIE, LLC</p> <p>SITE ACQUISITION</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>DRAWN BY: SASCO</td> <td>DATE: 06/13/2016</td> </tr> </table> <p>REV DATE DESCRIPTION BY</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>0 06/13/2016 90% CONSTRUCTION ENG</td> </tr> </table>	DRAWN BY: SASCO	DATE: 06/13/2016	0 06/13/2016 90% CONSTRUCTION ENG	<p>106TH AVE NE</p> <p>NEW 50' DOUGLAS FIR UTILITY POLE WITH NEW EQUIPMENT PROPOSED AERIAL POWER SERVICE DROP P.O.C. TO BE FIELD VERIFIED NEW AC DISTRIBUTION PANEL NEW 120/240V SUPPLY EXISTING CURB TYP. EXISTING GUTTER TYP. EXISTING SIDEWALK TYP. EXISTING GRASS TYP.</p>
DRAWN BY: SASCO	DATE: 06/13/2016				
0 06/13/2016 90% CONSTRUCTION ENG					
		<p>PR <input type="checkbox"/> LIMI <input type="checkbox"/> AR <input type="checkbox"/> TILIT <input type="checkbox"/> PLA <input type="checkbox"/></p> <p>O <input type="checkbox"/> LIMI <input type="checkbox"/> DIA <input type="checkbox"/> RAM <input type="checkbox"/></p> <p>24'-0" SCALE: 3'-0" = 1'-0" 11'-1" SCALE: 3'-3" = 1'-0"</p> <p>EXISTING SECONDARY NEW 120/240V SUPPLY NEW NEMA 3R DISCONNECT SWITCH NEW AC DISTRIBUTION PANEL NEW WIRING AND CONDUIT PER EQUIPMENT MANUFACTURER SPECIFICATIONS NEW EQUIPMENT NEW GROUND</p> <p>24'-0" SCALE: 3'-0" = 1'-0" 11'-1" SCALE: 3'-3" = 1'-0"</p> <p>2</p>			
		<p>SITE ID: 9WAB001622A 6623 106TH AVE NE KIRKLAND, WA 98033 106TH AVE NE & NE 65TH LN NEW WOOD UTILITY POLE</p> <p>SHEET TITLE ELECTRICAL PLAN</p> <p>SHEET NUMBER <input type="checkbox"/> 1</p> <p>2</p>			
<p>DRAWINGS ARE DIAGRAMMATIC AND NOT FOR CONSTRUCTION AND USE. THEY ARE THE PROPERTY OF MOBILITIE, LLC. ALL DIMENSIONS, NOTES AND EXISTING CONDITIONS ARE ESTIMATED. INCLUDING PROPERTY LINES, UTILITY CONNECTIONS, ROUTING, AND EASEMENTS TO BE FIELD VERIFIED PRIOR TO CONSTRUCTION.</p>					

mobilitie

A&E SERVICES

MOBILITIE, LLC

SASCO

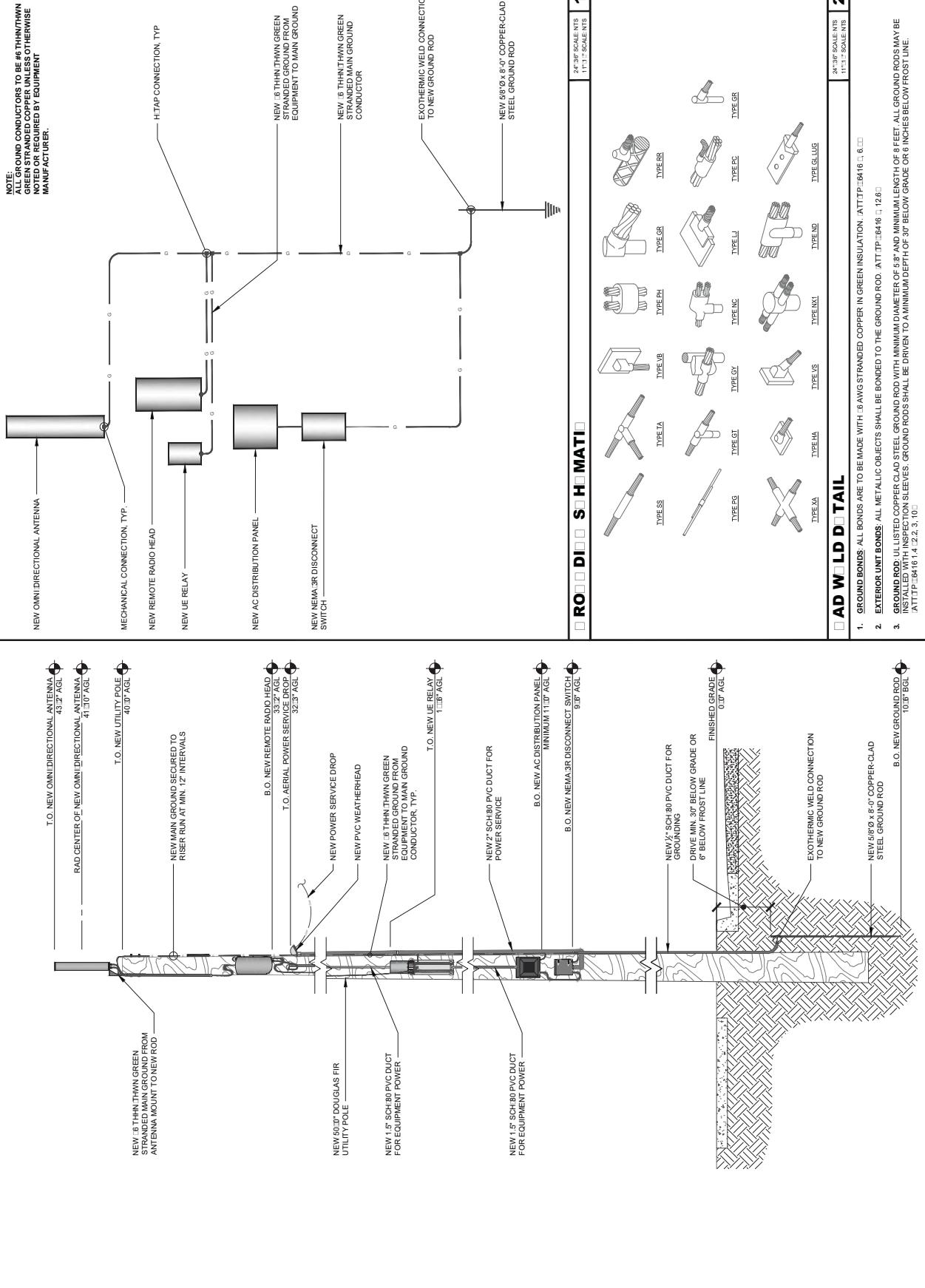
DRAWN BY:	SASCO
DATE:	06/13/2016

REV	DATE	DESCRIPTION	BY
0	06/13/2016	90% CONSTRUCTION ENG	

SHEET TITLE	GROUNDING PLAN
-------------	----------------

SHEET NUMBER

1



DRAWN BY:	SASCO
DATE:	06/13/2016
REV:	0
DATE:	06/13/2016
DESCRIPTION:	90% CONSTRUCTION ENG

FEET	DIMENSIONS
100	A (Distance Between Signs)
100	B (Distance Between Signs)
100	C (Distance Between Signs)
125	L (Merging Taper Length)
25	Maximum Tangent Channelizing Device Spacing
50	Maximum Tangent Channelizing Device Spacing

24'-0" SCALE: NTS
1'-0" SCALE: NTS

1



FEET	DIMENSIONS
100	A (Distance Between Signs)
100	B (Distance Between Signs)
100	C (Distance Between Signs)
125	L (Merging Taper Length)
25	Maximum Tangent Channelizing Device Spacing
50	Maximum Tangent Channelizing Device Spacing

DISTANCE BETWEEN SIGNS				
Speed MPH	Spacing ft.	A	B	C
40 or less	200	200	200	100
41 to 49	350	350	350	15
50 to 54	500	500	500	250
55 or greater	2640	1640	1000	500

"ROAD WORK 1 MILE" sign may be used as an alternate to the "ROAD WORK AHEAD" sign

500 beyond the "ROAD WORK AHEAD" sign or mid-day between signs, whichever is less

"BE PREPARED TO STOP" sign may be omitted for speeds of 45 MPH or less

1. Work operations shall be confined to one traffic lane, leaving the opposite lane open to traffic.
2. Additional one-way control may be effected by the following means:
 - Flag carrying vehicle
 - Official vehicle
 - Pilot vehicle
 - Traffic signal

LEGEND

- CHANNELLING DEVICE
- SIGN
- WORK SPACE
- FLAGGER
- DIRECTION OF TRAFFIC

GENERAL NOTES

5. The one channeling device directly in front of the "or" area and the one channeling device directly at the end of the "or" area may be omitted provided vehicles in the "or" area have high intensity rotating, flashing, oscillating, or strobe lights operating.
6. For general TCC requirements and additional information, refer to MUTCD.

DURATION NOTES

1. "ROAD WORK AHEAD" and the "BE PREPARED TO STOP" signs may be omitted if all of the following conditions are met:
 - a. Work operations are 60 minutes or less
 - b. Speed limit is 45 MPH or less
 - c. No sight obstructions to vehicles approaching the "or" area for a distance equal to the buffer space
 - d. Vehicles in the "or" area have high-intensity, rotating, flashing, oscillating, or strobe lights operating
 - e. Volume and complexity of the roadway has been considered
3. The "ONE LANE ROAD" signs are to be fully covered and the "FLAGGER" signs either removed or fully covered when no "or" is being performed and the road is open to traffic
4. When a side road intersects the roadway within the TTC zone, additional TTC devices shall be placed in accordance with applicable TCC Indexes.

SHEET ID: 9WAB001622A	TRAFFIC CONTROL PLAN
6623 106TH AVE NE KIRKLAND, WA 98033 106TH AVE NE & 65TH LN NEW WOOD UTILITY POLE	SHEET NUMBER T □ 1

SHEET TITLE	TRAFFIC CONTROL PLAN
SITE NUMBER	T □ 1

CONDITIONS

WHERE ANY VEHICLE, EQUIPMENT, WORKERS OR THEIR ACTIVITIES ENTRAP THE AREA BETWEEN THE CENTERLINE AND A LINE 2 OUTSIDE THE EDGE OF TRAVEL WAY

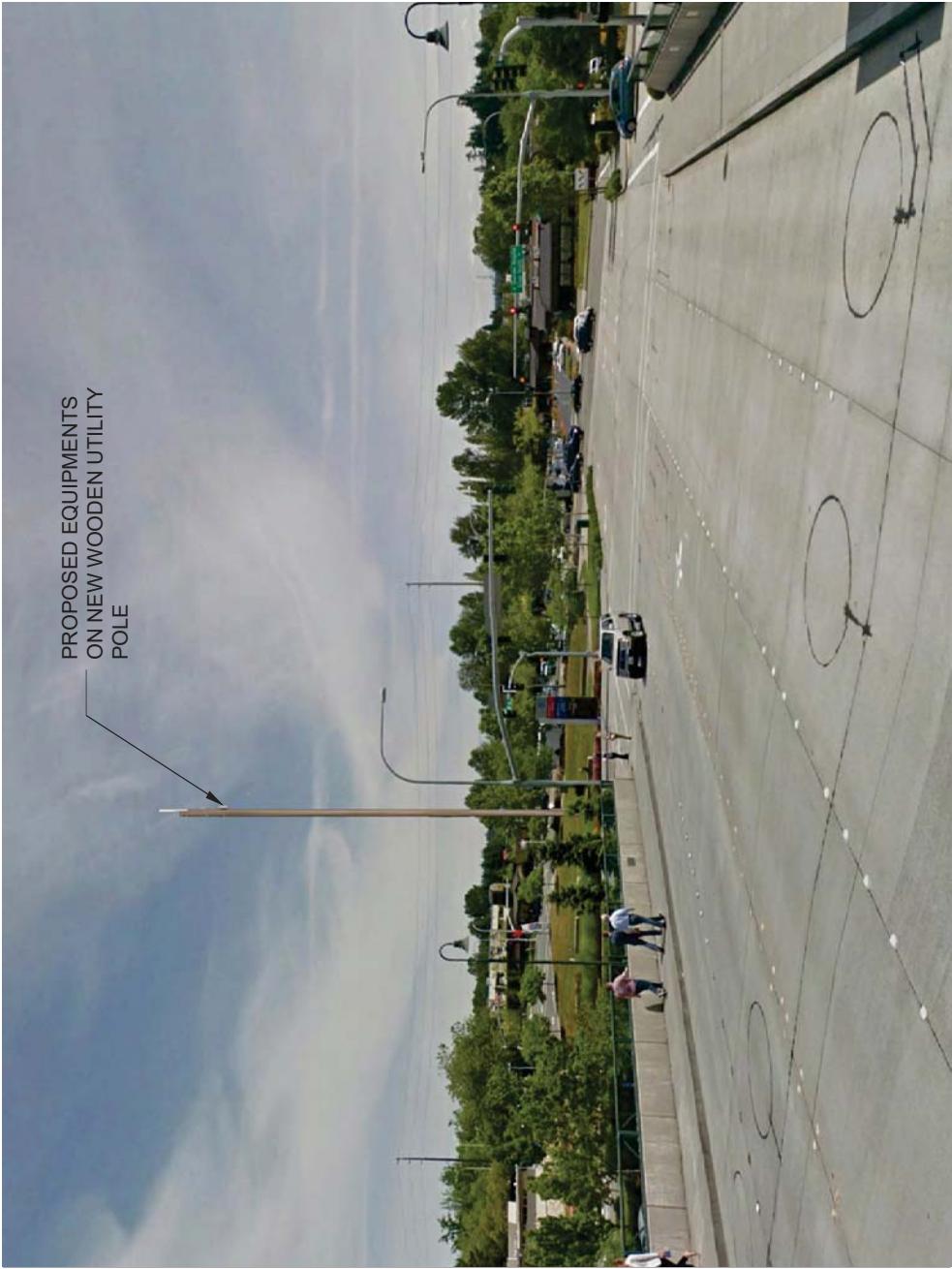
Exhibit C-2
Mobilitie Application for a Facility in Bellevue, WA

Narrative: Mobilitie proposed an 80 foot wood pole right in front of a major hospital campus in Bellevue, Washington. As the photo simulations show, this pole is significantly higher than existing traffic poles and decorative light standards and is in the middle of a well manicured green belt. Further, other than electric power lines on utility poles, all backhaul, power and other utilities are underground.

Exhibit C-2a: Photo Simulation

Exhibit C-2b: Construction designs

Exhibit C-2a



VIEW: 1 / 4

Site ID: 9WAB000745A
POLE TYPE: NEW WOODEN UTILITY POLE
NE. 10TH ST. & FELIX TERRY SWISTAK DR. NE.
BELLEVUE, WA 98004

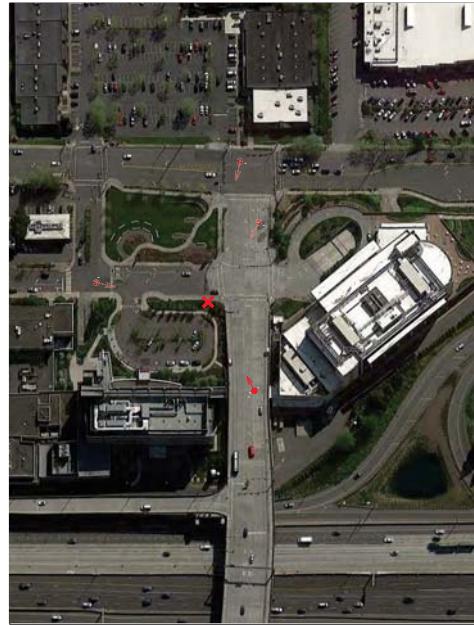
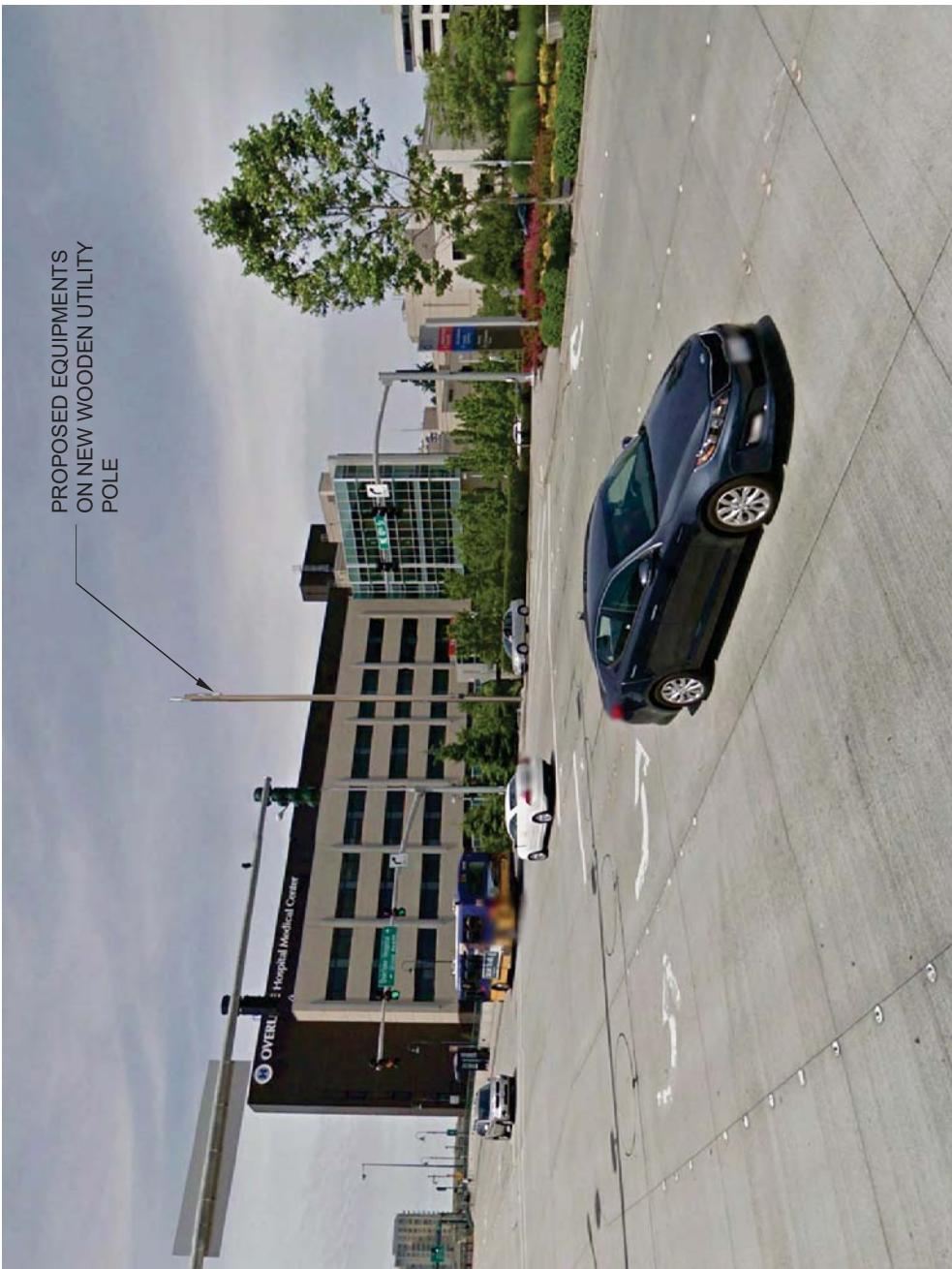


Photo Simulation By:
mobilitie
877 296 1009 | www.mobilitie.com

MOBILITIE, LLC.

Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.



VIEW: 2 / 4

Site ID: 9WAB000745A

POLE TYPE: NEW WOODEN UTILITY POLE
NE. 10TH ST. & FELIX TERRY SWISTAK DR. NE.
BELLEVUE, WA 98004

MOBILITY, LLC.

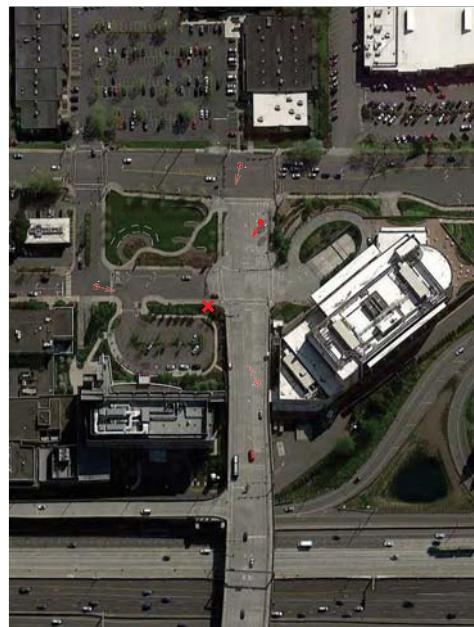
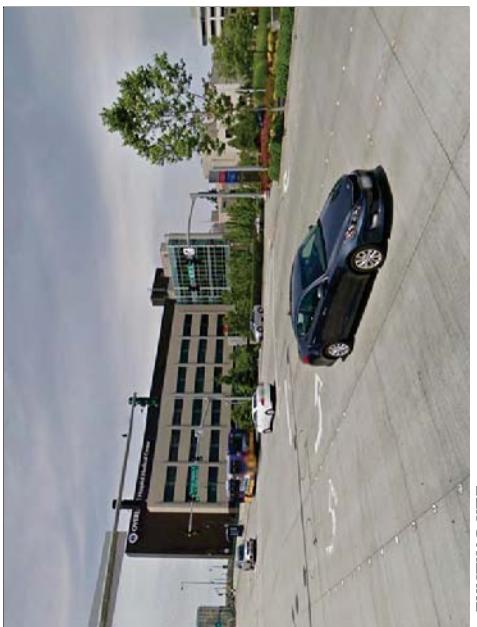


Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.

Photo Simulation By:

mobilitie

877 296 1009 | www.mobilitie.com



VIEW: 3 / 4

Site ID: 9WAB000745A

POLE TYPE: NEW WOODEN UTILITY POLE
NE. 10TH ST. & FELIX TERRY SWISTAK DR. NE.
BELLEVUE, WA 98004

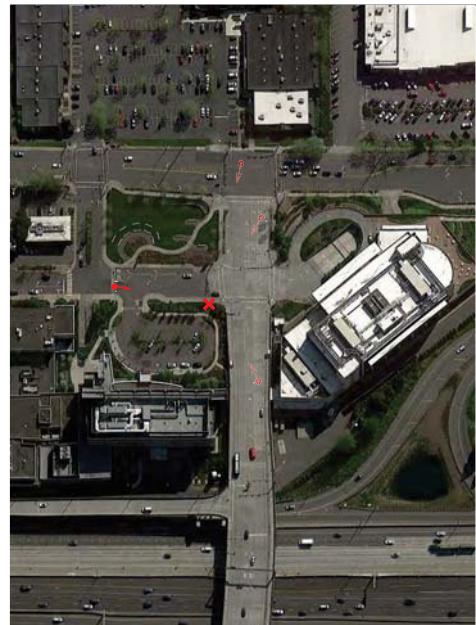


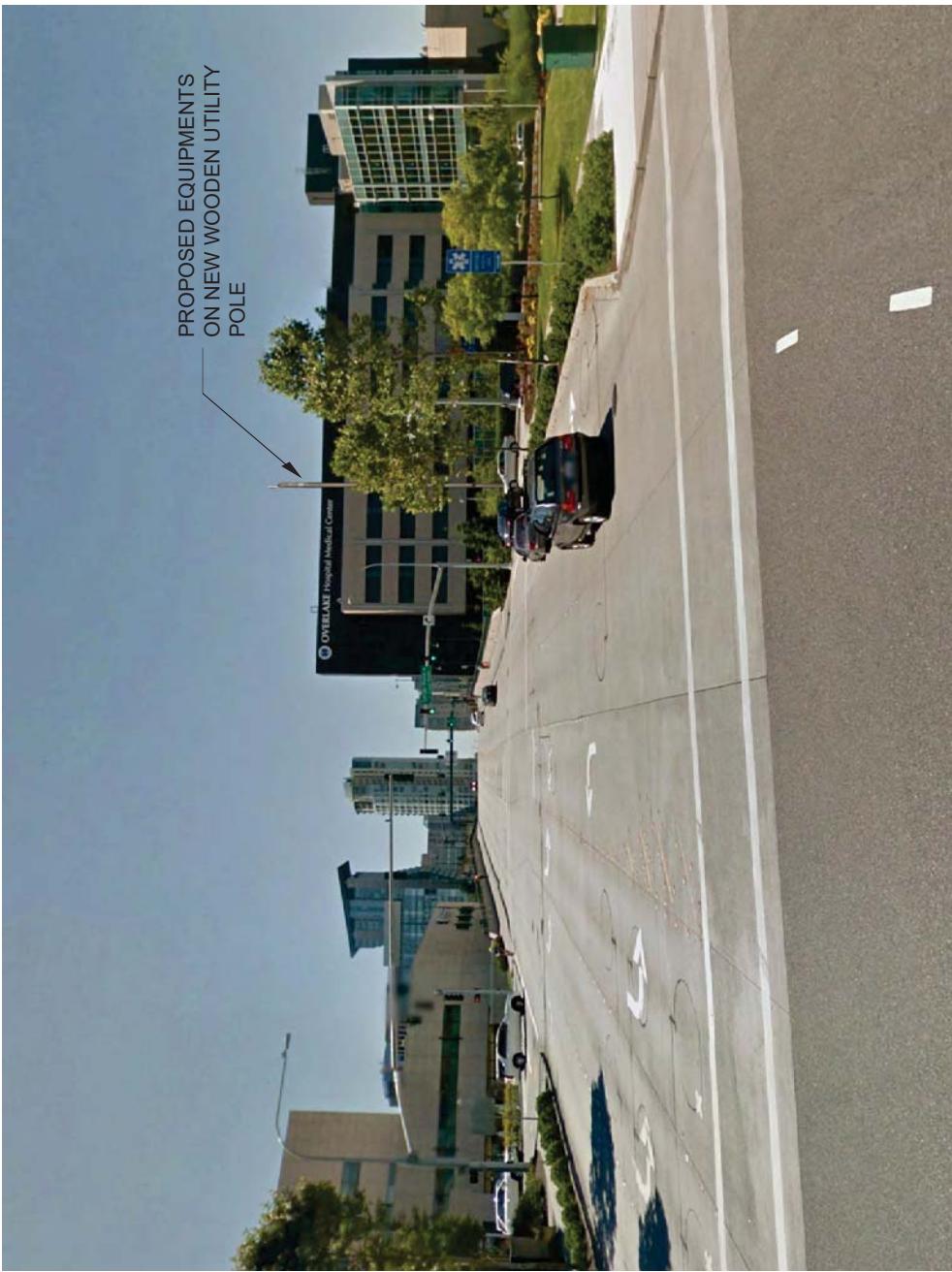
Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.

Photo Simulation By:

mobilite

877 296 1009 | www.mobilite.com



VIEW: 4 / 4

Site ID: 9WAB000745A

POLE TYPE: NEW WOODEN UTILITY POLE
NE. 10TH ST. & FELIX TERRY SWISTAK DR. NE.
BELLEVUE, WA 98004

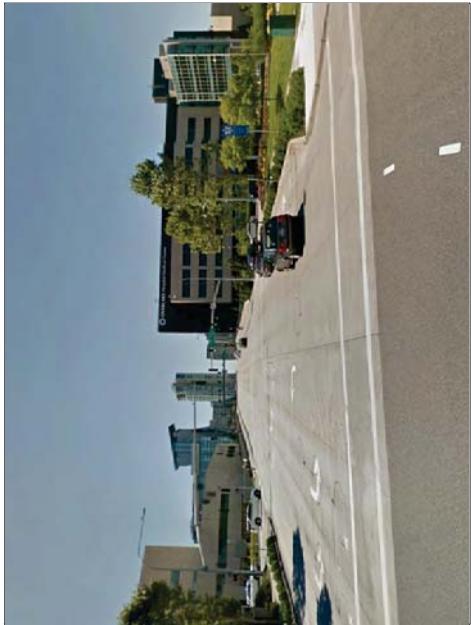


Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.

Photo Simulation By:

mobilitte

877 296 1009 | www.mobilitte.com

Exhibit C-2b



SITE ID: 9WAB000745A

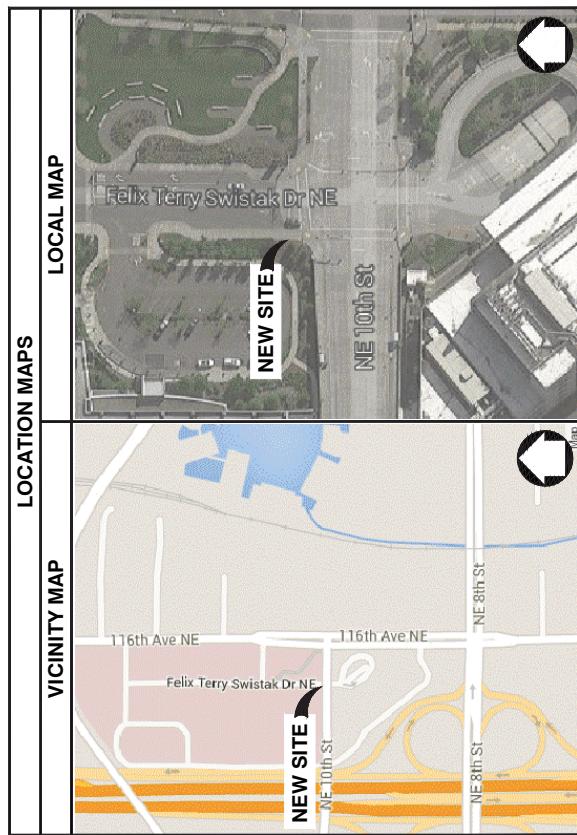
SITE LOCATION:
FELIX TERRY SWISTAK DR NE & NE 10TH ST
BELLEVUE, WA 98004

NEW WOOD UTILITY POLE

GENERAL NOTES	
<small>THE FACILITY IS NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINSAGE, NO SANITARY SEWER SERVICE, POTABLE WATER, OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL USEAGE IS REQUIRED.</small>	
SITE INFORMATION	
APPLICANT:	MOBILITE, LLC 2060 RED HILL, SUITE 2200 COSTA MESA, CA 92626
APPLICANT ADDRESS:	STEVIE BEIRNE
APPLICANT CONTACT:	206-901-1116
APPLICANT PHONE:	PUBLIC ROW
NEAREST PRIVATE PROPERTY:	1151 NE 1ST ST BELLEVUE, WA 98004
NEAREST APN S.:	6448110150
SITE LATITUDE:	47°37'45" N (47.629178)
SITE LONGITUDE:	122°11'12" W (181.869591)
GIS TYPE:	CAD/PLAT, 4 FT. ANS.
GROUND ELEVATION:	SEATTLE KING
COUNTY:	BELLEVUE CITY
JURISDICTION:	

DO NOT SCALE DRAWINGS

THIS DRAWING IS FOR INFORMATION & FIELD CONDITIONS ONLY.
THE PARTIES SHALL IMMEDIATELY NOTIFY THE ENGINEER OF ANY CHANGES OR
DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.



PROJECT DESCRIPTION	
<small>THIS CONTRACT PROVIDES FOR THE CONSTRUCTION OF A NEW SMALL CELL SITE WITHIN AN EXISTING RIGHT OF WAY. THE SCOPE WILL CONSIST OF THE FOLLOWING:</small> <ul style="list-style-type: none"> • ATTACH NEW EQUIPMENT TO NEW BUT DOUGLAS FIR UTILITY POLE • INSTALL ONE 4X DISTRIBUTION PANEL • INSTALL ONE REMOTE RADIO HEAD • INSTALL ONE GPS ANTENNA • INSTALL ONE DUAL DIRECTIONAL ANTENNA • INSTALL ONE THREE POSITION SWITCH 	
ENGINEERING	
9WAB000745A	GENERAL ORDER 98, CNA, Y-1; GENERAL ORDER 98, CA, OR-1;
IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF AN ENGINEER, TO ALTER THIS DOCUMENT.	GENERAL ORDER 98, CNA, OR-1;
DRAWING INDEX	
SHEET NO.:	SHEET TITLE
T.1	TITLE SHEET
T.2	GENERAL NOTES
T.3	SITE BANS
A.1	EAST NORTHWEST ELEVATIONS
A.2	EQUIPMENT DETAILS
D.1	EQUIPMENT DETAILS
D.2	ELECTRICAL PLANS
E.1	GROUNDING PLAN
G.1	TRAFFIC CONTROL PLAN
TC.1	



Call before you dig.
Washington
811 800 424 5555

DESIGN TEAM

MOBILITE, LLC, A/K/A SITE 200 COSTA MESA, CA 92626
COSTA MESA, CALIFORNIA, USA 92626
FAX: 714-558-1200, CMC: 714-558-1200
PHONE: 714-552-1020, CIN: 714-552-1015
EMAIL: Site200@site200.com - mobilite.com

T-1

SHEET NUMBER

<h3 style="font-size: 1em; font-weight: bold;">GENERAL CONSTRUCTION NOTES</h3> <p>1. ALL WORK SHALL CONFORM TO THE REQUIREMENTS OF THE LOCAL BUILDING CODE, THE LATEST EDITION AND ANOTHER APPARATE CODES AND ORDINANCES.</p> <p>2. CONTRACTOR SHALL CONSTRUCT IN ACCORDANCE WITH THESE DRAWINGS AND CONSTRUCTION SPECIFICATIONS 8011196.1 RE/HY. THE SPECIFICATION IS THE RULING DOCUMENT AND ANY DISCREPANCIES BETWEEN THE SPECIFICATION AND THESE DRAWINGS SHALL BE REFERRED TO THE ENGINEER FOR DETERMINATION OF WHICH SHALL PREVAIL.</p> <p>3. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED. THE CONTRACTOR MAY NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>4. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>5. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>6. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>7. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>8. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>9. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>10. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>11. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>12. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>13. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>14. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>15. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>16. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>17. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>18. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>19. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>20. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>21. ALL CONSTRUCTION IS TO ADHERE TO APPLICANT'S INTEGRATED CONSTRUCTION STANDARDS USE STATE CODE SMORE STANDARDS.</p> <p>22. THE ATTENT OF THE PLANS AND SPECIFICATIONS IS TO PERFORM THE CONSTRUCTION IN ACCORDANCE PER STATE BUILDING APPROVE PLANS AND SPECIFICATIONS WHEREVER THE FINISHED WORK WILL COMPLY WITH STATE CODE OR REGULATIONS A CHANGE ORDER DETAILS AND SPECIFICATIONS WHENEVER THE REQUIRED WORK SHALL BE SUBMITTED TO AND APPROVED BY THE JURISDICTION BEFORE PROCEEDING WITH THE WORK.</p>	<h3 style="font-size: 1em; font-weight: bold;">ELECTRICAL NOTES</h3> <p>1. ELECTRICAL CONTRACTOR SHALL SUPPLY AND INSTALL ALL ELECTRICAL WORK INDICATED. ANY ALL CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE NATIONAL ELECTRICAL CODE AND OTHER APPLICABLE CODES AND STANDARDS. THE CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>2. ELECTRICAL CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>3. CONTRACTOR SHALL VISIT THE SITE AND FAMILIAR ITSELF WITH ANY CONDITIONS AFFECTING THE WORK. CONTRACTOR SHALL NOT PRODUCE ANY PART OF THE PROJECT UNLESS THE CONTRACTOR HAS RECEIVED PAYMENT FOR THE WORK PERFORMED.</p> <p>4. WHETHER THE SCOPE OF WORK REQUIRES THE ADDITION OF A GROUNDS BAR TO AN EXISTING UTILITY OUTLET THE SUBCONTRACTOR SHALL NOT APPROVAL FROM THE UTILITY OWNER PRIOR TO MOUNTING THE GROUNDS BAR TO THE UTILITY POLE.</p> <p>5. ALL ELECTRICAL AND GROUNDING SYSTEMS SHALL BE CONDUCTED IN ACCORDANCE WITH THE NATIONAL ELECTRICAL CODE - NATIONAL FIRE PROTECTION ASSOCIATION NFPA 70, LAST EDITION, AND NFPA 1.</p>	<h3 style="font-size: 1em; font-weight: bold;">GROUNDING NOTES</h3> <p>1. GC SHALL USE PERMANENT MARKER TO DRAW THE LINE BETWEEN EACH SECTION AND LABEL EACH SECTION "P", "A", "B", "C".</p> <p>2. ALL HARDWARE IS STAINLESS STEEL, INCLUDING LOG WASHERS, COAT ALL SURFACES WITH AN INDEPENDENT COMPOUND BEFORE MATING. ALL HARDWARE SHALL BE STAINLESS STEEL .38 MM DIA. STEEL ON LARGER BEC ONE MATING. FOR GROUND BOND TO STEEL, ONLY INSERT A CADMIUM FLAT WASHER BETWEEN BEC AND STEEL. COAT ALL SURFACES WITH AN ANODIZED COMPOUND FOR MATING.</p> <p>3. WHERE THE SCOPE OF WORK REQUIRES THE ADDITION OF A GROUNDS BAR TO AN EXISTING UTILITY OUTLET THE SUBCONTRACTOR SHALL NOT APPROVAL FROM THE UTILITY OWNER PRIOR TO MOUNTING THE GROUNDS BAR TO THE UTILITY POLE.</p> <p>4. ALL ELECTRICAL AND GROUNDING SYSTEMS SHALL BE CONDUCTED IN ACCORDANCE WITH THE NATIONAL ELECTRICAL CODE - NATIONAL FIRE PROTECTION ASSOCIATION NFPA 70, LAST EDITION, AND NFPA 1.</p>
<p>SITE ACQUISITION</p> <p>DRAWN BY: SASCO DATE: 04/19/2016 BY:</p>	<p>SITE ACQUISITION</p> <p>DRAWN BY: SASCO DATE: 04/19/2016 BY:</p>	<p>SITE ID: 9WAB000745A</p> <p>FELIX TERRY SWISTAK DR NE & NE 10TH ST BELLEVUE, WA 98004 NEWWOOD UTILITY POLE</p>
<p>GENERAL NOTES</p> <p>SHEET NUMBER T-2</p>		



SITE WORK NOTES

1. DO NOT EXCAVATE CRUSTERS BEYOND THE PROPERTY LINES OR LINE LINES OTHERWISE NOTED.
2. DO NOT BUILD DIMENSIONS FROM SPRINGS.
3. SITE DRAWINGS AND TYPE OF ANY UNDERGROUND UTILITIES OR IMPROVEMENTS SHALL BE ACCURATELY NOTED AND DUCED ON ALL DRAWINGS BY GENERAL CONTRACTOR ISSUED TO ARCHITECT/ENGINEER AT COMPLETION OF PROJECT.
4. ALL EXISTING UTILITIES, FACILITIES, CONDITIONS AND THEIR DIRECTIONS SHOWN ON PLANS HAVE BEEN NOTED FROM AVAILABLE RECORDS. THE ENGINEER AND OWNER ASSUME NO RESPONSIBILITY WHATSOEVER AS TO THE ACCURACY OR OTHERWISE OF THE INFORMATION SHOWN ON THE PLANS. IT IS THE RESPONSIBILITY OF THE OWNER TO PROVIDE THE CONTRACTOR WITH A COPY OF THE APPROPRIATE RECORDS FOR THE AREA. THE CONTRACTOR SHALL NOT BE HELD LIABLE FOR ANY DAMAGE RESULTING FROM THE USE OF INFORMATION PROVIDED BY THE OWNER.
5. CONTRACTOR SHALL VERTICALLY AND HORIZONTALLY RELOCATE EXISTING UTILITIES BOTH HORIZONTALLY AND VERTICALLY PRIOR TO START OF CONSTRUCTION. CONTRACTOR SHALL BE RESPONSIBLE FOR ALL COSTS INCURRED IN THIS PROCESS. CONTRACTOR SHALL NOT BE HELD LIABLE FOR ANY DAMAGE TO EXISTING UTILITIES WHICH ARE NOT LOCATED IN THE DRAWINGS. CONTRACTOR SHALL NOT BE HELD LIABLE FOR ANY DAMAGE TO EXISTING UTILITIES WHICH ARE NOT LOCATED IN THE DRAWINGS. CONTRACTOR SHALL NOT BE HELD LIABLE FOR ANY DAMAGE TO EXISTING UTILITIES WHICH ARE NOT LOCATED IN THE DRAWINGS.
6. ALL REVENUE AND DRAINAGE UTILITIES SHALL BE ADJUSTED TO SITE CONDITIONS ON SITE AND MEANS TO BE DETERMINED BY CONTRACTOR.
7. RELOCATING UTILITIES IN THE GRAVEL IS TO BE SHOVED AND TO LEAVE THEM IN EXISTING GROVES AT THE GRAVEL LINE.
8. ALL TEMPORARY EXCAVATIONS FOR THE INSTALLATION OF FOUNDATIONS, UTILITIES, ETC. SHALL BE PROPERLY BENCH'D OR BRAZED IN ACCORDANCE WITH CORRECT OCCUPATIONAL SAFETY AND HEAL ADMINISTRATION OSHA REQUIREMENTS.
9. CONTRACTOR SHALL CLEAN UP SITE AFTER CONSTRUCTION SUCH THAT NO PAPERS, TRASH, WEEDS, BRUSH OR ANY OTHER MATERIALS WHICH COULD DAMAGE THE SOIL OR CAUSE HAZARD TO THE ENVIRONMENT SHALL BE DISPOSED OF OFF SITE BY THE GENERAL CONTRACTOR.
10. NEW GRAVEL NOT BUILDING AND DRAINS WILL BE COMPACTED TO 15% OF MINIMUM STANDARDS PROVIDED BY INDUSTRY COMPACTED TO 16% OF STANDARD PROCTOR DENSITY.
11. ALL SITES SHALL BE PLACED IN UNIFORM THICKNESS. THICKNESS SHOULD NOT EXCEED THAT WHICH CAN BE PROPERLY COMPACTED IN ONE PASS. THE EQUIPMENT USED SHALL BE SHOVED AND TO LEAVE THEM IN EXISTING GROVES AT THE GRAVEL LINE.
12. ANY TILLS PLACED ON DRAINS SHALL NOT EXCEED 10 INCHES. TO HONOR TO 10 INCHES, IT IS THE CONTRACTOR'S RESPONSIBILITY TO ENSURE THAT THE TILLS ARE SPACED BY 6 INCHES.
13. CONTRACTOR SHALL CLEAN UP THE SITE AFTER CONSTRUCTION SUCH THAT NO PAPERS, TRASH, WEEDS, BRUSH OR ANY OTHER MATERIALS WHICH COULD DAMAGE THE SOIL OR CAUSE HAZARD TO THE ENVIRONMENT SHALL BE DISPOSED OF OFF SITE BY THE GENERAL CONTRACTOR.
14. ALL TREES AND SHRUBS WHICH ARE NOT IN SET CONTACT WITH THE EXCAVATIONS SHALL BE PROTECTED BY THE GENERAL CONTRACTOR.
15. ALL UTILITY WORK SHALL BE CAREFULLY COORDINATED BY GENERAL CONTRACTOR AND LOCAL UTILITY COMPANY. TELEPHONE COMPANY AND ANY OTHER UTILITY COMPANIES HAVING JURISDICTION OVER THIS LOCATION.

ENVIRONMENTAL NOTES

1. ALL WORK PERFORMED SHALL BE DONE IN ACCORDANCE WITH ISSUED PERMITS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR CONTRACTOR AND DEVELOPER SHALL BE RESPONSIBLE FOR CONSTRUCTION AND MAINTENANCE OF EROSION AND SEDIMENT CONTROL MEASURES AND MAINTAINING A NEAR EARTH SITE AND SHORELINE. CONTRACTOR SHALL NOT ALLOW ANY EARTHWORK AND SHORELINE WORK TO BE PERFORMED ON THE PROPERTY. CONTRACTOR SHALL NOT ALLOW ANY EARTHWORK AND SHORELINE WORK TO BE PERFORMED ON THE PROPERTY.
2. CONTRACTOR SHALL MAINTAIN INITIAL CONCRETE ALONG THE PROPERTY LINE AND JACKET CONCRETE INSIDE THE PROPERTY LINE. CONTRACTOR SHALL NOT ALLOW ANY EARTHWORK AND SHORELINE WORK TO BE PERFORMED ON THE PROPERTY.
3. CONTRACTOR SHALL PROVIDE ALL EROSION AND SEDIMENTATION CONTROL MEASURES AS REQUIRED BY LOCAL COUNTY AND STATE CODES AND ORDINANCES. PROJECT EQUIPMENT IS PROTECTED AGAINST LOSS OF SOIL AND SEDIMENT BY STRAW, COKE, AND OTHER MATERIALS. CONTRACTOR SHALL PROVIDE ALL EROSION AND SEDIMENTATION CONTROL MEASURES AS REQUIRED BY LOCAL COUNTY AND STATE CODES AND ORDINANCES. PROJECT EQUIPMENT IS PROTECTED AGAINST LOSS OF SOIL AND SEDIMENT BY STRAW, COKE, AND OTHER MATERIALS.
4. NO SEDIMENT SHEETING SHALL BE ALLOWED TO GO ON THE PROPERTY. THE CONTRACTOR IS RESPONSIBLE FOR TAKING APPROPRIATE MEASURES FOR CONTRACTOR'S OWNERSHIP. ADDITIONAL SEDIMENT CONTROL MEASURES MAY BE REQUIRED. MANY AREAS SUBJECT TO THE RISK OF EROSION. CONTRACTOR SHALL BE RESPONSIBLE FOR THE DOWNSTREAM SIDE OF THE DRAINS ON THE SITE. IT IS THE CONTRACTOR'S RESPONSIBILITY TO PREVENT EROSION AND SEDIMENTATION. CONTRACTOR MUST MAINTAIN THE PROPERTY AS A RESULT OF EROSION. CONTRACTOR WILL BE CHARGED AT THE CONTRACTOR'S EXPENSE.
5. CONTRACTOR SHALL BE RESPONSIBLE FOR DAILY INSPECTIONS AND ANY REPAIRS OF ALL SEDIMENT CONTROL MEASURES INCLUDING SEDIMENT REMOVAL AS NECESSARY.
6. CLEARING OF VEGETATION AND TREE REMOVAL SHALL BE ONLY AS PERMITTED AND BE HELD TO A MINIMUM. ONLY TREES NECESSARY FOR CONSTRUCTION ON THE PROPERTY SHALL BE REMOVED.
7. SEEING ANIMALS AND OR SODDING OF THE SITE WILL BE ACCOMPLISHED AS SOON AS POSSIBLE AFTER COMPLETION OF THE PROJECT FACILITIES AFFECTING LAND SURFACE.
8. CONTRACTOR SHALL PROVIDE ALL EROSION AND SEDIMENTATION CONTROL MEASURES AS REQUIRED BY LOCAL COUNTY AND STATE CODES AND ORDINANCES. PROJECT EQUIPMENT IS PROTECTED AGAINST LOSS OF SOIL AND SEDIMENT BY STRAW, COKE, AND OTHER MATERIALS.
9. RIFRAPS OF ERODED SHELL CONSIST OF CLEAN, HARD, SOUND, DURABLE, UNIFORM QUALITY STONE, FREE OF ANY MATTER, OIL, ASH, OR OTHER DETERIOROUS SUBSTANCES. DETEGRATED MATERIAL ORGANIC MATTER, OIL, ASH, OR OTHER DETERIOROUS SUBSTANCES.
10. GC TO PLACE FILTER MATERIAL AT ALL CATCH BARS SINGE ADQUATIC TO CONSTRUCTION SITE TO PREVENT SOLID WASTE CONTAMINATION FROM ENTERING SEWER SYSTEM.

mobilitie	
MOBILITIE, LLC	
A&E SERVICES	
MOBILITIE, LLC	
SITE ACQUISITION	
DRAWN BY:	SASCO
DATE:	04/19/2016
REV	0
DATE	04/19/2016
DESCRIPTION	90% CONSTRUCTION
BY	ENG
SITE ID:	
9W/B000745A	
FELIX TERRY SWISTAK DR NE & NE 10TH ST BELLEVUE, WA 98004 NEW WOOD UTILITY POLE	
SHEET TITLE	
GENERAL NOTES	
SHEET NUMBER	
T-3	

mobilitie

A&E SERVICES

MOBILITIE, LLC

SITE ACQUISITION

DRAWN BY:	SASCO
DATE:	04/19/2016

SITE ID:

9W/B000745A
FELIX TERRY SWISTAK DR NE &
NE 10TH ST
BELLEVUE, WA 98004
NEWWOOD UTILITY POLE

SHEET TITLE

SITE PLANS

SHEET NUMBER
A-1

ENLARGED SITE PLAN

SITE PLAN

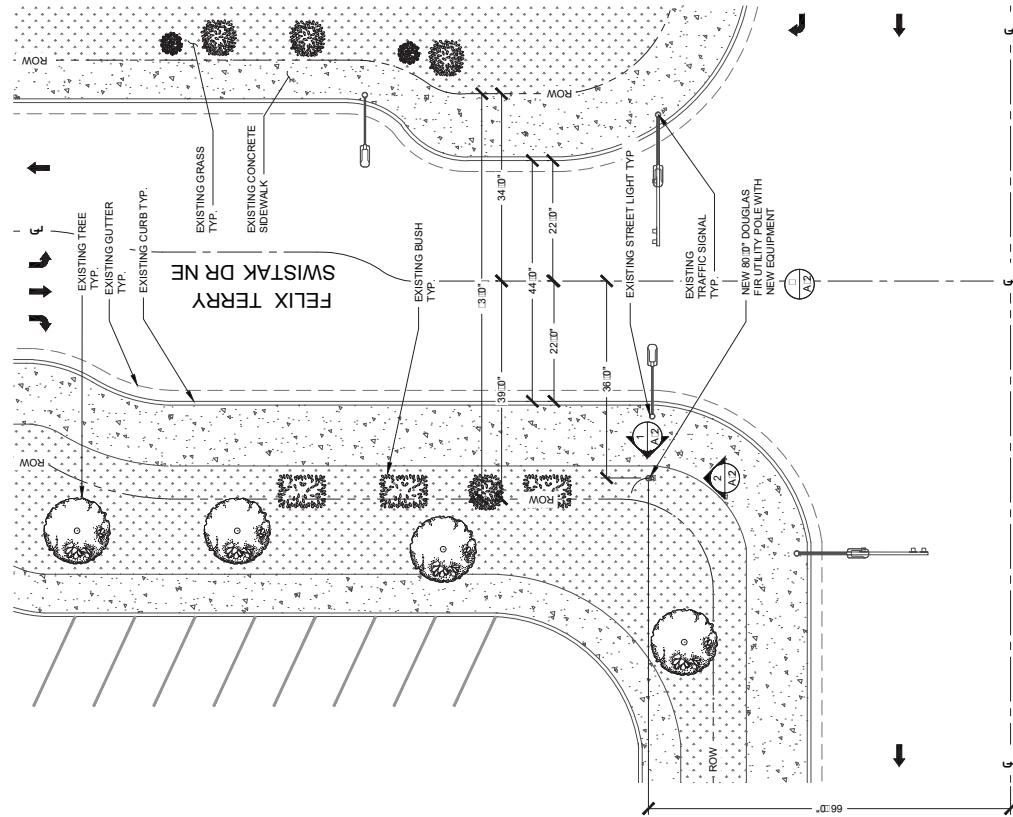
24'-0" SCALE 3'10" = 1'

11'-1" SCALE 3'32" = 1'

20'-0" SCALE 3'10" = 1'

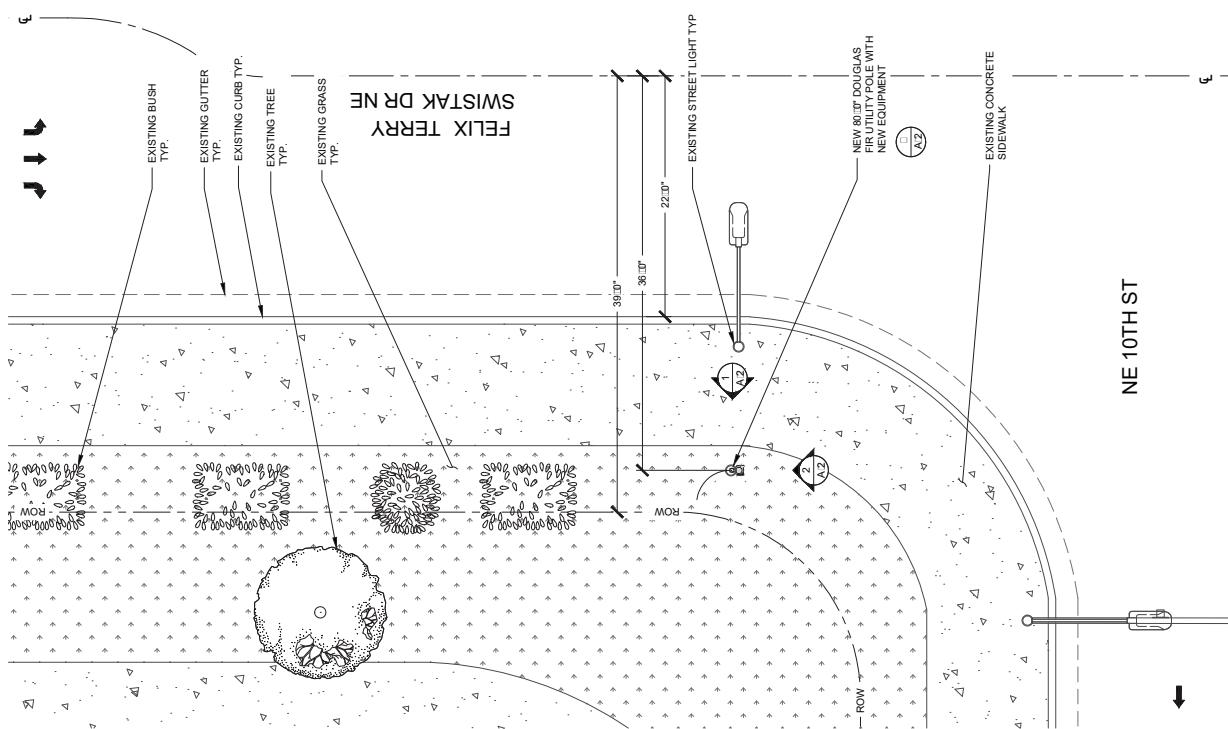
11'-1" SCALE 3'32" = 1'

1



NE 10TH ST

NE 10TH ST



mobilitie

NEW EQUIPMENT SECURED TO
 POLE WITH 3/16 STAINLESS
 STEEL BANDS 3 TYP.
 SEE DETAIL "A"

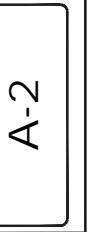
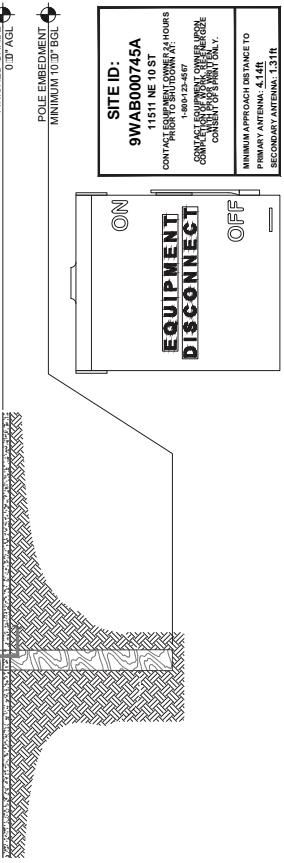
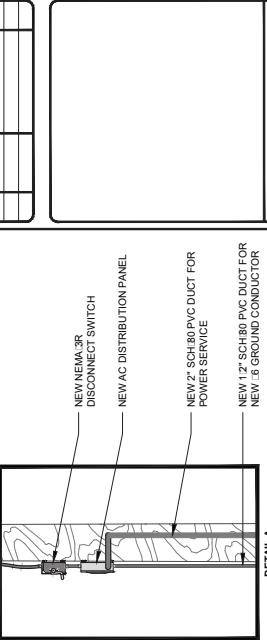
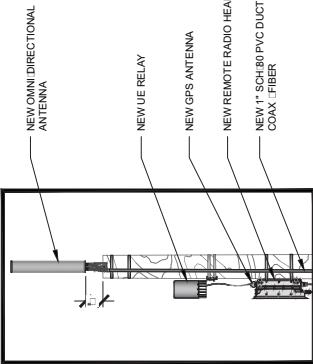
T.O. NEW OMNIDIRECTIONAL ANTENNA
 68' 2" AGL
 RAD CENTER OF NEW OMNI DIRECTIONAL ANTENNA
 6' 10" AGL
 T.O. NEW UTILITY POLE
 68' 0" AGL
 T.O. NEW RELAY
 63' 7" AGL

NEW 1' SCH 80 PVC DUCT FOR COAX FIBER
 B.O. NEW REMOTE RADIO HEAD
 59' 2" AGL

MOBILITIE, LLC

SITE ACQUISITION

DRAWN BY:	SASCO
DATE:	04/19/2016
REV	0
DATE	04/19/2016
DESCRIPTION	90% CONSTRUCTION ENG
BY	

B.O. NEW REMOTE RADIO HEAD
59' 2" AGL

SHEET NUMBER

©FF

9WAB000745A

EQUIPMENT DISCONNECT

ON

FELIX TERRY SWISTAK DR NE &
NE 10TH ST
BELLEVUE, WA 98004
NEWWOOD UTILITY POLE

SITE ID:

9WAB000745A

CONTRACTORS MUST USE PROPER SAFETY
PRACTICES AND FOLLOW ALL APPLICABLE
CODES, STANDARDS, SPECIFICATIONS AND
MINIMUM APPROACH DISTANCE TO
PRIMARY ANTENNA: 4.14R
SECONDARY ANTENNA: 1.31R
DISCONNECT SWITCH FRONT PANEL
INNER PANEL
SITE IDENTIFICATION

SHEET TITLE

A-2

NEW EAST ELEVATION

1

EQUIPMENT CHART			
DESCRIPTION	CABLE LENGTH	DIMENSIONS H'W'D'	WEIGHT
1 ALPHA WIRELESS AW3415'S OMNI DIRECTIONAL ANTENNA	TBD	28.5' X 5'8	88 LBS
1 AIRSPAN R480 UE ANTENNA	TBD	13' X 7'8	88 LBS
1 PCTEL 3910 D DHW GPS ANTENNA	TBD	2.48' X 2.36' X .48'	11 LBS
1 AIRSPAN AH10000 REMOTE RADIO HEAD	TBD	18.9' X 16' X .48'	34.14 LBS
1 RAYCAR RSTAC 3111P 120AC DISTRIBUTION PANEL	TBD	13.1' X 11.4" X .4"	8 LBS
1 SIEMENS GFZ21R NEMA 3R DISCONNECT SWITCH	TBD	9.9" X 8.5" X .45"	5 LBS



NEW NORTH ELEVATION

4

<p>mobilitie</p> <p>A&E SERVICES</p>		MOBILITE, LLC		SITE ACQUISITION DRAWN BY: SASCO DATE: 04/19/2016	
<p>ALPHA WIRELESS</p> <p>MANUFACTURER: ALPHA WIRELESS MODEL: AWP-1000D OR APPROVED EQUAL HEIGHT: 18.9 IN WIDTH: 9.0 IN DEPTH: 3.4 IN WEIGHT: 8.1 LBS MOUNT WEIGHT: 1.1 LB</p>				DRAWN BY: SASCO DATE: 04/19/2016	
<p>NOT USED</p> <p>POLE CLAMP</p> <p>MANUFACTURER: AIRSPAN MODEL: AR-1000D OR APPROVED EQUAL HEIGHT: 4.4 IN WIDTH: 4.9 IN DEPTH: 1.9 IN WEIGHT: 2.2 LBS</p>	<p>SCALE N.T.S.</p>	<p>REMOTE RADIO HEAD</p> <p>MANUFACTURER: PCTEL MODEL: 30-1010W OR APPROVED EQUAL HEIGHT: 9.0 IN WIDTH: 4.8 IN DEPTH: 2.36 IN WEIGHT: 0.11 LB</p>	<p>SCALE N.T.S.</p>	<p>OMNI DIRECTIONAL ANTENNA</p> <p>MANUFACTURER: AIRSPAN MODEL: R460 OR APPROVED EQUAL HEIGHT: 13 IN WIDTH: 7 IN DEPTH: 8.6 IN WEIGHT: 8.1 LBS</p>	<p>SCALE N.T.S.</p>
<p>NOT USED</p> <p>AC DISTRIBUTION PANEL</p> <p>MANUFACTURER: ALPHA WIRELESS MODEL: AWP-1000D SPIM OR APPROVED EQUAL HEIGHT: 21.5 IN WIDTH: 16.1 IN DEPTH: 1.6 IN WEIGHT: 1.1 LB</p>	<p>SCALE N.T.S.</p>	<p>GPS ANTENNA</p> <p>MANUFACTURER: SIEMENS MODEL: GNSS21R OR APPROVED EQUAL HEIGHT: 9.0 IN WIDTH: 8.6 IN DEPTH: 4.6 IN WEIGHT: 1.1 LB</p>	<p>SCALE N.T.S.</p>	<p>IRELAY 460 MOUNTING BRACKET</p> <p>MANUFACTURER: AIRSPAN MODEL: MC46020284 OR MC46020285 OR APPROVED EQUAL HEIGHT: 5.6 IN WIDTH: 1.5 IN DEPTH: 1.5 IN WEIGHT: 2.1 LB</p>	<p>SCALE N.T.S.</p>
<p>NOT USED</p> <p>POL TOP MOUNT</p> <p>NOTE: BRACKET SHOWN WITH THROUGH-BOLT CONFIGURATION. OTHER MOUNTING METHODS AVAILABLE.</p>	<p>SCALE N.T.S.</p>	<p>NEMA-3R DISCONNECT SWITCH</p>	<p>SCALE N.T.S.</p>	<p>UE RELAY</p>	<p>SCALE N.T.S.</p>
<p>NOT USED</p> <p>EQUIPMENT DETAILS</p> <p>SHEET NUMBER</p> <p>D-1</p>					<p>SCALE N.T.S.</p>

mobilite

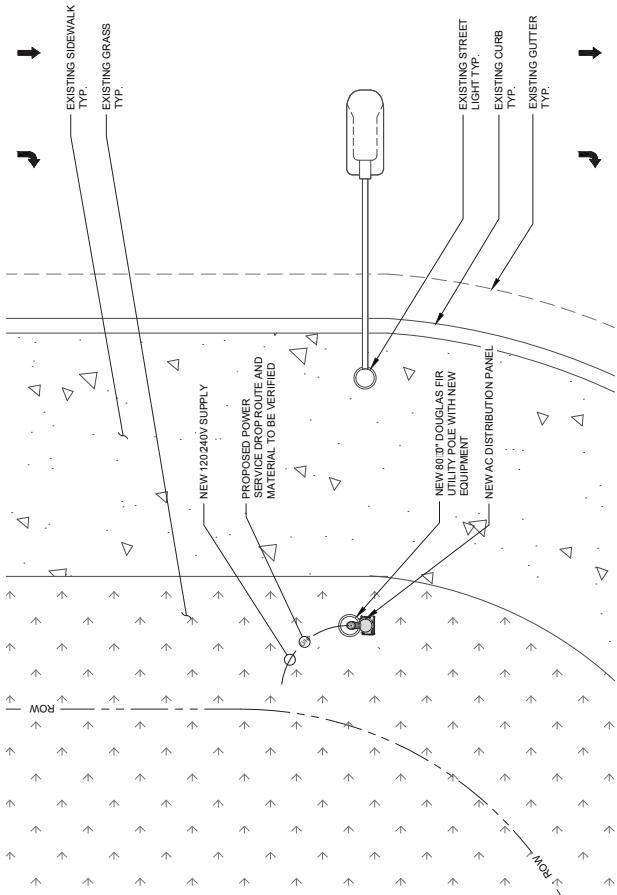
A&E SERVICES

MOBILITE, LLC

SITE ACQUISITION

DRAWN BY: SASCO
DATE: 04/19/2016

REV	DATE	DESCRIPTION	BY
0	04/19/2016	90% CONSTRUCTION ENG	

FELIX TERRY
SWISTAK DR NE

PRELIMINARY UTILITY PLAN

EXISTING POWER P.O.C.

NEW 120/240V SUPPLY

NEW NEMA 3R DISCONNECT SWITCH

NEW AC DISTRIBUTION PANEL

NEW WIRING AND CONDUIT PER EQUIPMENT MANUFACTURER SPECIFICATIONS

NEW EQUIPMENT

NEW GROUND

PROPOSED POWER FEED FROM POWER PROVIDER ROUTED TO NEW EQUIPMENT. NEW CONDUIT AND WIRING TO BE ROUTED ON EXTERIOR OF NEW UTILITY POLE

2'-0" SCALE: 3'8" = 1'0"

1'

1'-11" SCALE: 3'10" = 1'0"

2'

1'-6"

2'

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF AN ELECTRIC UTILITY OR AN ENGINEER, TO ALTER THIS DOCUMENT.

SITE ID:
9W/B000745AFELIX TERRY SWISTAK DR NE &
NE 10TH ST
BELLEVUE, WA 98004
NEWWOOD UTILITY POLE

SHEET TITLE:

ELECTRICAL PLAN

SHEET NUMBER
E-1

2'-0" SCALE: 3'10" = 1'0"

1'

1'-6"

4'

mobilitie

A&E SERVICES

MOBILITIE, LLC

SITE ACQUISITION

DRAWN BY: SASCO

DATE: 04/19/2016

SITE ID:

9W/B000745A

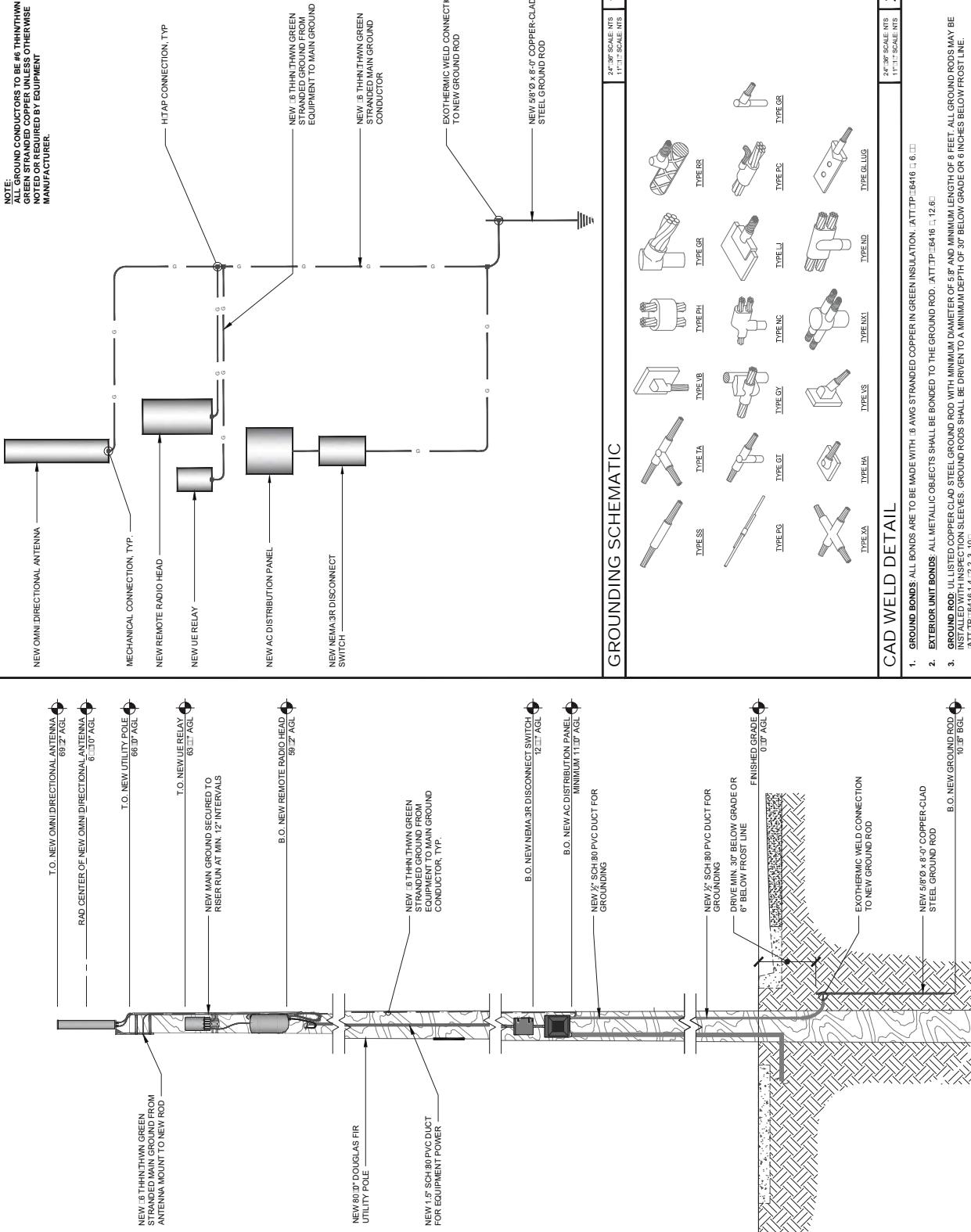
FELIX TERRY SWISTAK DR NE &
NE 10TH ST
BELLEVUE, WA 98004
NEWWOOD UTILITY POLE

SHEET TITLE

GROUNDING
PLAN

SHEET NUMBER

G-1

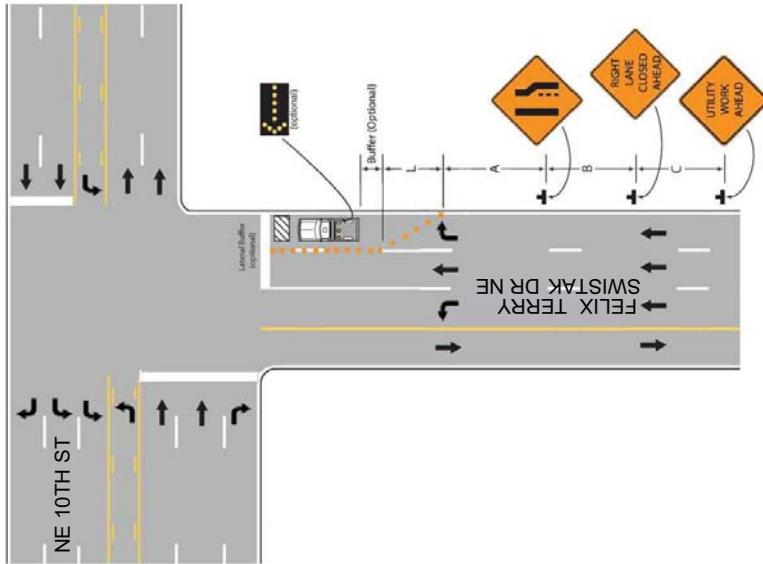


3 GROUNDING NOTES

SITE ACQUISITION

DRAWN BY:	SASCO
DATE:	04/19/2016
REV:	0
DATE:	04/19/2016
DESCRIPTION	90% CONSTRUCTION ENG

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF AN ENGINEER, TO ALTER THIS DOCUMENT.

SITE ID:
9W/B000745AFELIX TERRY SWISTAK DR NE
NE 10TH ST
BELLEVUE, WA 98004
NEWWOOD UTILITY POLE**TRAFFIC CONTROL PLAN****TC-1**

DISTANCE	DIMENSIONS FEET				
	Speed MPH	A	B	C	D
A (Distance Between Signs)	100				
B (Distance Between Signs)	100	200	200	100	
C (Distance Between Signs)	100	350	350	150	
L (Merging Taper Length)	125				
Maximum Taper Channelizing Device Spacing	25				
Maximum Tangent Channelizing Device Spacing	50				

DISTANCE BETWEEN SIGNS

Speed MPH	A	B	C	D
40 or less	200	200	200	100
41 to 49	350	350	350	150
50 to 54	500	500	500	250
55 or greater	2640	1640	1000	500

"ROAD WORK 1 MILE" sign may be used as an alternate to the "ROAD WORK AHEAD" sign 500' beyond the "ROAD WORK AHEAD" sign on mid-block signs, whichever is less.

- "BE PREPARED TO STOP" sign may be omitted for speeds of 45 MPH or less
- A single channeling device may be used to control traffic on the road way open to traffic.

LEGEND

- * CHANNELLING DEVICE
- ↑ SIGN
- WORK SPACE
- FLAGGER
- DIRECTION OF TRAFFIC

1. The "ONE LANE ROAD" signs are to be fully covered and the "FLAGGER" signs either removed or fully covered when no traffic is being performed and the road way is open to traffic.
2. When a side road intersects the road way within the TTC zone, additional TTC devices shall be placed in accordance with applicable TC Indexes.
3. The "ROAD WORK AHEAD" and the "BE PREPARED TO STOP" signs may be omitted if all of the following conditions are met:
 - a. Work operations are 60 minutes or less
 - b. Speed limit is 45 MPH or less
 - c. No sight obstructions to vehicles approaching the road way for a distance equal to the buffer space
 - d. Vehicles in the road way have high intensity, rotating, flashing, oscillating, or strobe lights operating
 - e. Volume and complexity of the road way has been considered
4. When a side road intersects the road way within the TTC zone, additional TTC devices shall be placed in accordance with applicable TC Indexes.

DURATION NOTES

1. "ROAD WORK AHEAD" and the "BE PREPARED TO STOP" signs may be omitted if all of the following conditions are met:
 - a. Work operations are 60 minutes or less
 - b. Speed limit is 45 MPH or less
 - c. No sight obstructions to vehicles approaching the road way for a distance equal to the buffer space
 - d. Vehicles in the road way have high intensity, rotating, flashing, oscillating, or strobe lights operating
 - e. Volume and complexity of the road way has been considered

CONDITIONS

WHERE ANY VEHICLE, EQUIPMENT, WORKERS OR THEIR ACTIVITIES ENTRANCE THE AREA BETWEEN THE CENTERLINE AND A LINE 2 OUTSIDE THE EDGE OF TRAVEL WAY

Exhibit C-3
Mobilitie Application for a Facility in Kent, WA

Narrative: Mobilitie proposed a 120 foot pole right in a commercial district in Kent, Washington. As the photo simulations show, this pole is significantly higher than existing utility poles. In addition, Mobilitie did not indicate whether they could co-locate this on existing infrastructure, such as a large power transmission tower less than a block away.

Exhibit C-3a: Photo Simulation

Exhibit C-3b: Construction designs

Exhibit C-3a

Photo Simulation By:



877 296 1009 | www.mobilite.com



Site ID : 9WAX000357A

Pole Type: New Steel Utility Pole

68th Ave S & S 224th St
Kent, WA, 98032

SITE DESCRIPTION: NEW TRANSPORT SITE
WITHIN EXISTING RIGHT OF WAY

Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.



PROPOSED VIEW: Not Site Specific



EXISTING VIEW

Photo Simulation By:

mobilite[®]
intelligent infrastructure
877 296 1009 | www.mobilite.com

Site ID : 9WAX000357A

Pole Type: New Steel Utility Pole

68th Ave S & S 224th St
Kent, WA, 98032

Photo Simulation

This photographic simulation is intended as a visual representation only and is not to be used for construction purposes. Accuracy of photo simulation is based on information provided by project applicant.



intelligent infrastructure

Exhibit C-3b

mobilite®

intelligent infrastructure

9WAX000357A



Know what's below.

Call before you dig.

PROJECT NUMBER:
DRAWN BY: **###**
CHECKED BY: **###**

9WAX000357A

Mobilite, LLC

GENERAL NOTES		LOCATION MAPS		NORTH		PROJECT DESCRIPTION	
THE FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OF EFFECT ON DRAINAGE; NO SANITARY SEWER SERVICE, POTABLE WATER OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.		VICINITY MAP		REGIONAL MAP		END USER PROPOSES TO INSTALL A NEW UTILITY POLE WITHIN AN EXISTING RIGHT-OF-WAY. THE SCOPE WILL CONSIST OF THE FOLLOWING:	
						1. INSTALL PROPOSED 120' UTILITY POLE	
SITE INFORMATION		CODES		SHEET INDEX		NOTICE	
POLE ID: 9WAX000357A ADDRESS/CROSS STREET: 68th Ave S & S 224th St CITY, STATE ZIP: Kent, WA 98032 PROPERTY OWNER: PUBLIC RIGHT-OF-WAY APPLICANT: Mobilite, LLC APPLICANT ADDRESS: 2955 REDHILL AVENUE, SUITE 200 COSTA MESA, CA 92626		2015 INTERNATIONAL BUILDING CODE 2014 NATIONAL ELECTRICAL CODE		SHEET # SHEET DESCRIPTION 0.0 TITLE SHEET 1.0 EXHIBIT PHOTO & SITE PLAN 2.0 UTILITY POLE ELEVATIONS 3.0 ELECTRICAL		IT IS A VIOLATION OF THE LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.	
DO NOT SCALE DRAWINGS		SHEET INFORMATION		TITLE SHEET		SHEET NUMBER	
		SITE INFORMATION 9WAX000357A 47-400918-122-249537 68th Ave S 224th St UTILITY POLE		TITLE SHEET 0.0		0.0	
CONTRACTORS SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS & FIELD CONDITIONS ON THE JOB SITE & SIGN IMMEDIATELY NOTIFY THE ARCHITECT/ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.							

PROJECT DESCRIPTION	
Preliminary Not For Construction	
SHEET # SHEET DESCRIPTION 0.0 TITLE SHEET 1.0 EXHIBIT PHOTO & SITE PLAN 2.0 UTILITY POLE ELEVATIONS 3.0 ELECTRICAL	
SITE INFORMATION 9WAX000357A 47-400918-122-249537 68th Ave S 224th St UTILITY POLE	
TITLE SHEET 0.0	
SHEET NUMBER 0.0	



mobilite
intelligent infrastructure

Mobilite, LLC

PROJECT NUMBER:
DRAWN BY:
CHECKED BY:

9WAX000357A

####

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Preliminary
Not For
Construction

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SITE INFORMATION

9WAX000357A
68th Ave S & S 224th St
Kent, WA 98022

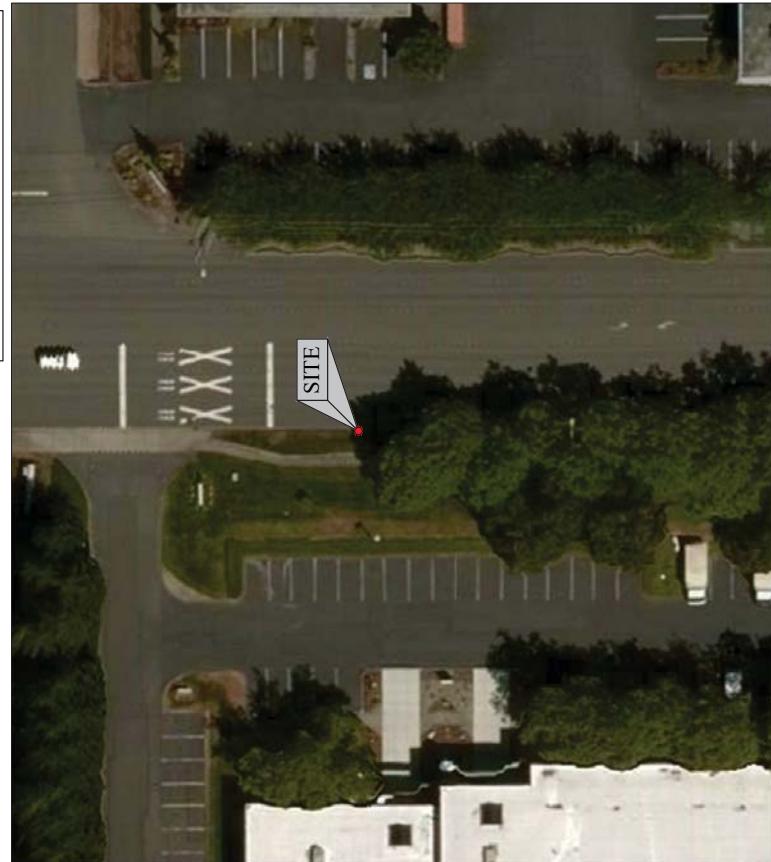
UTILITY POLE

SHEET TITLE
EXHIBIT PHOTO &
ENLARGED SITE PLAN

SHEET NUMBER
1.0

NOTE:
THIS SITE PLAN WAS GENERATED WITHOUT THE USE
OF A SURVEY, PROPERTY LINES, POWER &
UTILITY PINT CONNECTORS/ROUTES AND EASEMENTS
SHOWN ON THESE PLANS ARE ESTIMATED.

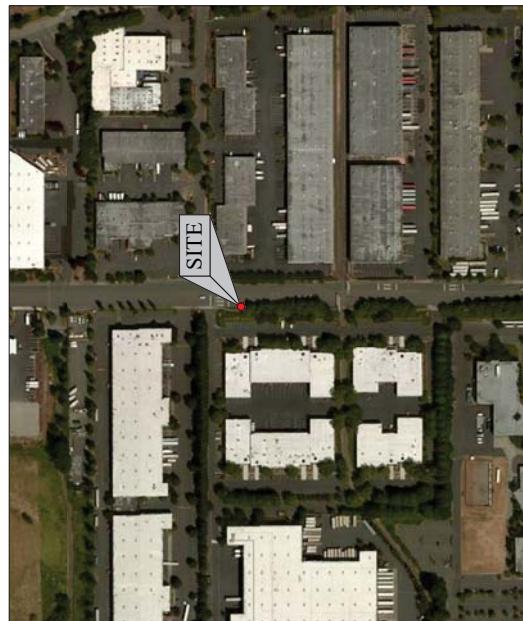
NOTE:
PROPOSED 120'0" POLE IN THE R.O.W.
R.O.W. BOUNDARIES TO BE CONFIRMED AFTER
SURVEY



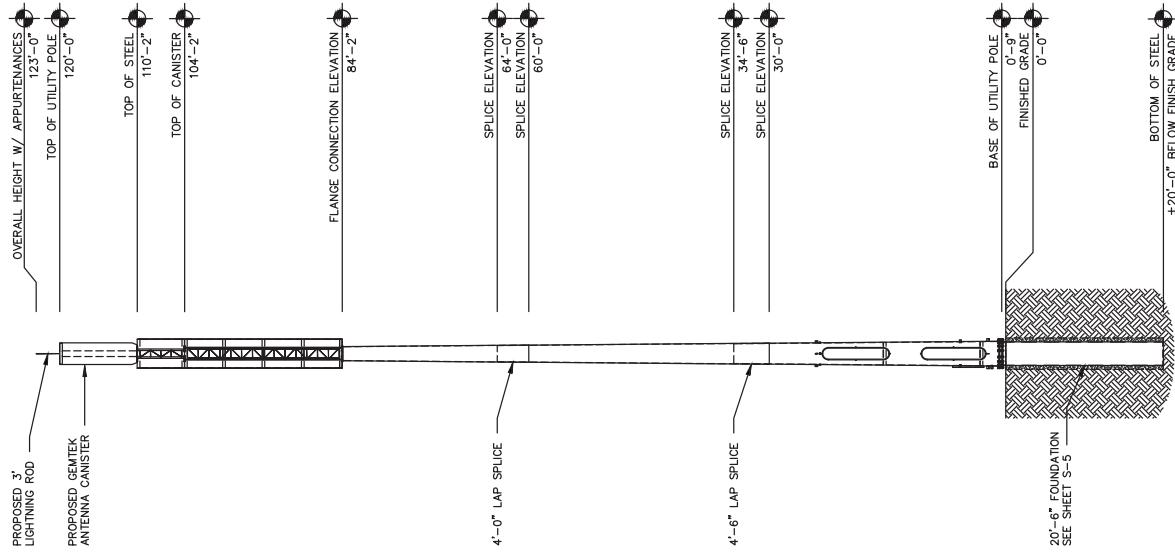
(1) EXHIBIT PHOTO – GENERIC (NOT SITE SPECIFIC)
SCALE: N.T.S.



(1) EXHIBIT PHOTO – GENERIC (NOT SITE SPECIFIC)
SCALE: N.T.S.



(2) AERIAL SITE LOCATION
SCALE: N.T.S.



SECTION	5	4	3	2	1	S-3	.3
LENGTH (FT)	33.750	34.000	24.167	-	-	-	-
THICKNESS (IN)	0.75	0.250	0.188	0.188	0.188	0.188	0.188
NUMBER OF SIDES	3	3	3	3	3	3	3
GRADE	A36						
TOP DIAMETER	30.876	25.194	25.194	21.344	21.344	26.407	26.407
BOTTOM DIAMETER	38.000	32.319	32.319	26.465	26.465	25.407	25.407
WEIGHT (K)	10.1	4.7	2.7	1.2	1.2	1.2	1.2
REFERENCE SHEET							

- POLE DESIGN NOTES:**
1. POLE IS DESIGNED FOR EXPOSURE C TO THE ALL WIND - CANTED.
 2. ALL WIND SPURS ARE BASED ON 3 SECOND GUSTS.
 3. POLE IS DESIGNED FOR A 30 MPH BASIC WIND IN ACCORDANCE WITH TIA-222-C STANDARD.
 4. POLE IS ALSO DESIGNED FOR A 30 MPH BASIC WIND WITH 0.75 IN ICE. ICE IS CONSIDERED TO INCREASE THICKNESS WITH HEIGHT.
 5. DEFLECTIONS ARE BASED UPON A 60 MPH WIND.
 6. POLE STRUCTURE CLASS II.
 7. FOUNDATION DIMENSIONS DETERMINED USING NORMAL SOILS, SITE SPECIFIC GEOTECH REQUIRED FOR FINAL DESIGN.
- POLE MANUFACTURER NOTES:**
1. THERMAL STUDY SHALL BE PERFORMED BY THE POLE MANUFACTURER TO DETERMINE IF THE PROPOSED EQUIPMENT INSIDE POLE IS BEING ADEQUATELY COOLED/HEATED AND PROVIDE A CLIMATE CONTROL SYSTEM AS NECESSARY BY DESIGN.
 2. POLE MANUFACTURER SHALL ENSURE THE THE POLE IS WATERPROOF SO THAT THE INTERIOR COMPONENTS OF THE POLE ARE NOT ADVERSELY AFFECTED BY THE EXTERIOR ELEMENTS.
 3. POLE ANALYSIS CALCULATIONS AND THERMAL STUDY SHALL BE PROVIDED TO THE ENGINEER OF RECORD WITH THE POLE SUBMITTAL PACKAGE.
 4. POLE SHAFT AND ALL PORT RIM STEEL TO BE 65 ksi.
 5. ALL OTHER PLATE TO BE 50 ksi.

Mobilite, LLC

PROJECT NUMBER:	9WAX000357A
DRAWN BY:	####
CHECKED BY:	####

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 UTILITY POLE
ELEVATION

 2.0

SHEET NUMBER
1

GRADE	Fy	Fu	GRADE	Fy	Fu
A572-50	50 ksi	65 ksi	A572-55	65 ksi	80 ksi
A36	36 ksi	55 ksi			

MATERIAL STRENGTH					
GRADE	Fy	Fu	GRADE	Fy	Fu
A572-50	50 ksi	65 ksi	A572-55	65 ksi	80 ksi

SITE INFORMATION

9WAX000357A

 68th Ave S & S 224th St
Kent, WA 98022
UTILITY POLE

 SHEET TITLE
UTILITY POLE ELEVATIONS

 POLE ELEVATION
SCALE: 1"-0" = 1'-0" ON 20'-0" SHEET

1

PROJECT NUMBER:
DRAWN BY:
CHECKED BY:
REVISIONS
9WAX00357A

###

Preliminary
Not For
Construction

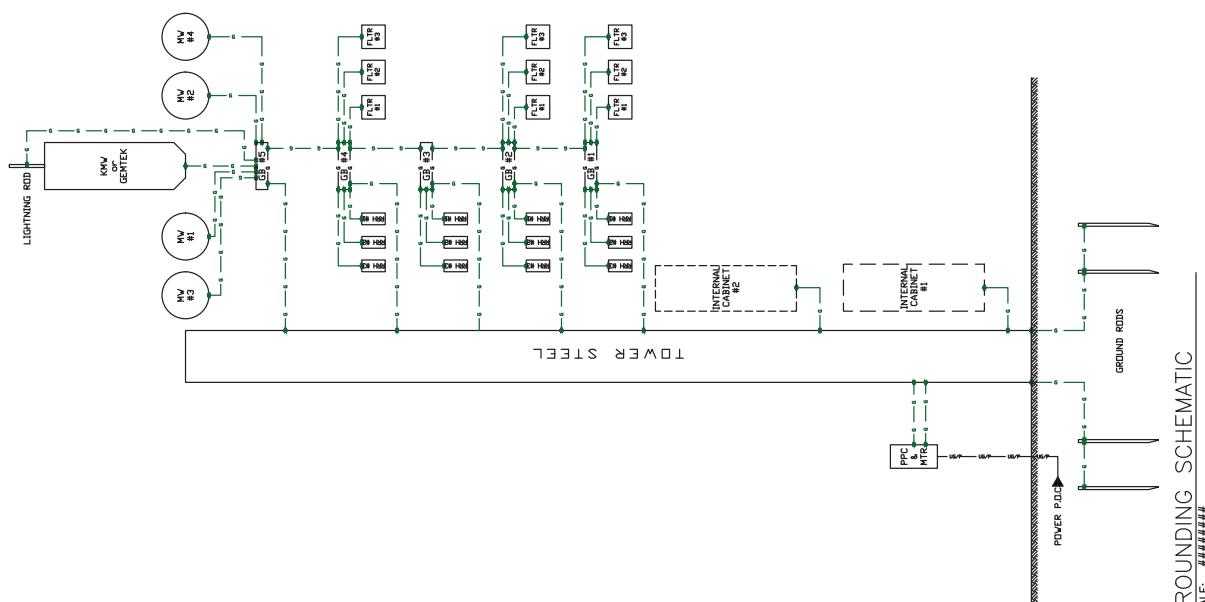
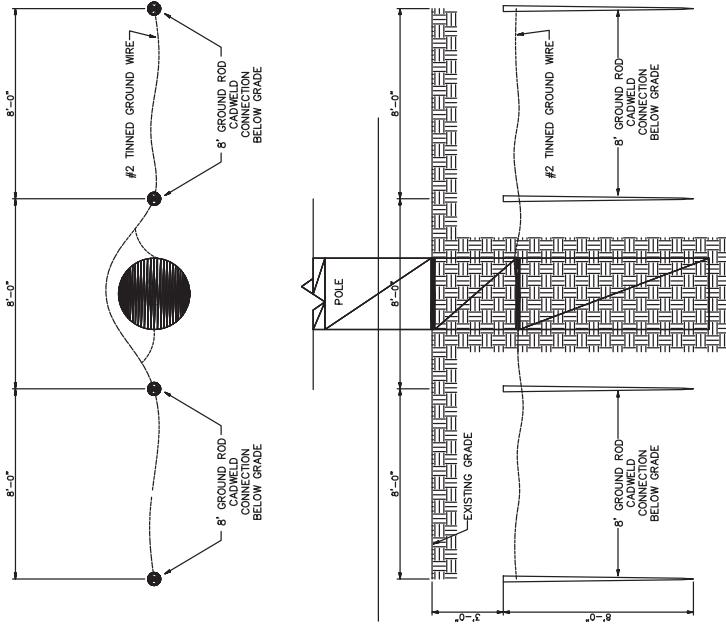
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ENGINEER, TO ALTER THIS DOCUMENT

SITE INFORMATION
9WAX00357A
68th Ave S & S 24th St
Utility Pole

SHEET TITLE:
ELECTRICAL

SHEET NUMBER:
3.0

NOTE:
1. ALL GROUNDS SHALL BE #2AWG STRANDED COPPER GREEN INSULATED WIRE UNLESS OTHERWISE SPECIFIED
OR REQUIRED BY MANUFACTURER OR LOCAL ORDINANCE.
2. ALL EXPOSED MECHANICAL GROUND CONNECTIONS WILL BE MADE USING 2-HOLE LUGS OR
ITEM-PREScribed HARDWARE.
3. ALL CONNECTIONS SHALL BE MADE WITH A PROTECTIVE COATING OF AN ANTI-OXIDE COMPOUND KNOWN
AS "NO-OXIDE" BY DEARONE CHEMICAL CO.
4. FOR GROUNDING TO TOWER STEEL, INSERT A CADMIUM FLAT WASHER BETWEEN LUG AND STEEL COATING.
ALL SURFACES WITH "NO-OXIDE-A" COMPOUND BEFORE MATING.
5. ALL IN-EARTH GROUND CONNECTIONS WILL BE MADE USING EXOTHERMIC BONDS OR "CADWELLS".
6. CONTRACTOR TO VERIFY AND TEST GROUND TO SOURCE, 10 OHMS MAXIMUM. PROVIDE SUPPLEMENTAL
GROUNDING RODS AS REQUIRED (@ 8'-0" O.C.) TO ACHIEVE SPECIFIED OHMS READING GROUNDING AND OTHER
OPTIONAL TESTING WILL BE WITNESSED BY THE APPLICANT REPRESENTATIVE.



(1) GROUNDING SCHEMATIC
SCALE: ######

(2) GROUND CONNECTION DETAIL
SCALE: ######